

## **Modern Slavery Statement**

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the steps that MEDITE SMARTPLY has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place in our supply chain within our business operations in the United Kingdom or elsewhere.

We have a zero tolerance approach to any form of modern slavery and are committed to acting ethically and with integrity and transparency in all our dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## **Scope**

For the purposes of this policy, MEDITE SMARTPLY comprises of the following entities:

- MEDITE SMARTPLY (UK) Limited, with an address of Persimmon House, Anchor Boulevard, Crossways Business Park, Dartford, Kent DA2 6QH, England, trading under the brand name MEDITE SMARTPLY.
- Smartply Europe DAC, with an address of Belview, Slieverue, Waterford, X91 PX75, Ireland, trading under the brand name MEDITE SMARTPLY; and
- Medite Europe DAC, with an address of Redmondstown, Clonmel, Co. Tipperary, E91 V584, Ireland, trading under the brand name MEDITE SMARTPLY.

## **Our policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

## **Our suppliers**

We operate and maintain a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

Anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. They must also demonstrate that they have effective policies in place to manage and mitigate risks.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They hold their own suppliers to account over modern slavery
2. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
3. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
4. We may terminate the contract at any time should any instances of modern slavery come to light

## **Training**

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## **Approval for this statement**

Our financial year ends on 31<sup>st</sup> December.

This statement was approved by the directors and signed by the director below on 1<sup>st</sup> January 2024.



**Neil Foot**  
**Director**