



## Spineart UK Ltd. Modern Slavery Statement

This statement is made pursuant to s.54 Modern Slavery Act 2015 and sets out the steps that Spineart UK Ltd. has taken to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

### **Our Business**

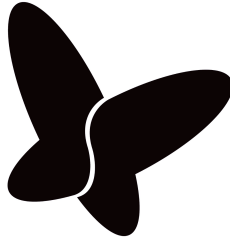
Spineart UK Ltd. (Spineart) is a commercial business providing Spinal products and services direct to NHS supply chains, NHS organisations and Private healthcare groups. The company being a subsidiary of Spineart SA based in Geneva, Switzerland.

### **Our Policies on Slavery and Human Trafficking**

Spineart is committed to ensuring that there is no modern slavery or human trafficking in any part of our business activities or supply chain. As an organisation operating and providing products and services to private & public sector clients, we recognise that we must act ethically and with integrity in our business relationships. Implementing, enforcing and reviewing our controls on slavery and human trafficking are an integral part of our ethical trading.

To ensure that Spineart is commitment to prevent modern slavery and human trafficking in its operations and supply chain, the company has the following internal policies and procedures;

- Recruitment – robust screening checks are undertaken to ensure that all new employees are eligible to work in the United Kingdom and are not being forced to work against their will.
- Whistleblowing Policy – the company has a Whistleblowing Policy which provides employees, suppliers, customers and others with the confidence to report any concerns regarding our business activities, including issues involving modern slavery and human trafficking.
- Procurement – When undertaking procurement of services and goods we assess prospective supplier(s) to ensure: (i) they comply with all relevant Law and Guidance and shall use Good Industry Practice to ensure that there is no slavery or human trafficking in its supply chains; and (ii) they shall notify Spineart Senior Managers immediately if it becomes aware of any actual or suspected incidents of slavery or human trafficking in its supply chains;



## **Due Diligence Processes**

Spineart has an internal risk management process to ensure that risks are identified and mitigated with appropriate controls implemented. As part of our risk management process we have systems in place to identify and assess potential risk areas for modern slavery and human trafficking both within our business and in our supply chain. Concerns raised through our Whistleblowing policy are investigated and those raising concerns are protected.

## **Supplier Compliance to Our Ethical Trading**

Spineart UK Ltd. recognises the importance of influencing ethical business practices through its supply chain and, in this regard, shall seek compliance with its high ethical standards from all of its suppliers in respect of modern slavery and human trafficking. Potential suppliers shall be assessed as part of any procurement exercise as well as during contract performance reviews. Where appropriate contract clauses shall be used to facilitate compliance. Compliance shall involve senior managers and directors with support from Human Resources, Procurement and legal staff where required.

## **Training**

Spineart reviews training requirements for employees annually to identify training needs and ensure a high standard of competence for all of its staff. The need for awareness and other training for staff in respect of modern slavery and human trafficking will form a part of the annual training review.

## **Approval of this Statement**

This statement has been approved by the Board of Directors in November 2018.

Name: Fadel Ghossein

Position: Sales Director North Europe, France & Italia