

BSN medical statement on modern slavery and human trafficking

This statement is made pursuant to s.54 of the United Kingdom Modern Slavery Act 2015. It sets out the steps that the BSN medical Group has taken and is continuing to take under its Human Rights Policy to ensure that modern slavery or human trafficking is excluded from its UK and global businesses and supply chain.

Introduction

The BSN medical Group (referred to herein as 'BSN') is committed to protecting and promoting human rights globally; we understand that modern slavery encompasses slavery, servitude, human trafficking and forced labour.

We know that modern slavery is a growing issue globally, and no industry or region can be considered immune. BSN does not tolerate child labour, forced labour, including prison labour, or any use of force or other form of coercion, fraud, deception, abuse of power or other means to achieve control over another person for the purpose of exploitation.

Wherever we operate in the world, BSN is committed to conducting business with honesty and integrity; treating all people with dignity and respect and complying with applicable laws, regulations and treaties.

Products and areas of operations

BSN develops products for wound care and related vascular diseases, lymphology, and non-invasive orthopaedics with facilities in Germany, France, Mexico, India, Pakistan, South Africa, Colombia, Venezuela, Brazil, New Zealand, and the United States. BSN operates worldwide through affiliates, joint ventures, and agents across Europe and Scandinavia; Canada, Chile, China, Indonesia, Japan, Malaysia, Philippines, Thailand and Vietnam.

Our suppliers

Our UK business is served by suppliers from across the world and human rights and labour standards are key considerations in the supplier selection process regardless of location. To date, the labour standards performance of suppliers serving our UK business have been evaluated using the CERES self-assessment questionnaire – 'Building the Foundations of Sustainable Supply Chains.' We are now developing a risk based labour standards assurance web platform to extend supplier due diligence across our global operations, including the UK business. The process will align with the UK Government 'Flexible Framework for Sustainable Procurement' and the NHS 'Strategy on Sustainability' to ensure stakeholder expectations are met. We recognise some regions have an elevated risk of labour standard and human rights infringements and consequently our initial focus will be on suppliers located in South America, South East Asia and China.

Our Policies

Labour standards are a central pillar of BSN's commitment to ethical business. We take a cross functional approach and have policies in place to address Labour Standards, Recruitment and Compliance underpinned by our internal Code of Conduct and by the Code of Conduct for BSN Business Partners. Adherence to the Codes of Conduct is mandatory for both BSN employees and its suppliers. The BSN Compliance Line provides a confidential vehicle for stakeholders to report concerns over any aspect of BSN's activities, including those linked to labour abuses, human trafficking or modern slavery.

Roles and responsibilities

Overall responsibility for labour standards including human trafficking and modern slavery rests with the Chief Executive Officer. Responsibility for implementing the labour standards assurance system and identifying and correcting real or potential infringements is delegated to the Health Safety and Environment and Procurement teams to promote improvement across the supply chain.

BSN medical statement on modern slavery and human trafficking

Training

The BSN medical Code of Conduct for BSN Business Partners has been distributed to tier 1 suppliers. Key BSN employees have attended webinars on the UK NHS Labour standards assurance system, the Modern Slavery Act 2015 and the UN Global Compact. Awareness training and training on the operation of the BSN web based labour standards platform will be delivered to the functions and facilities in 2017.

Performance indicators

Objectives have been set for key managers and progress is regularly reviewed and reported in internal period and annual reports. BSN has since achieved level 1 compliance of the mandatory UK NHS labour standards assurance system. Labour standards have been integrated into internal audit programs and key performance indicators of improvement will be established during implementation of the labour standards assurance web platform to monitor compliance and effectiveness.

Group Management Committee approval March 2017

This statement has been approved by the BSN medical Group Management Committee.

Signed:  on behalf of GMC

Role of signatory: *Chief Legal Officer / Head of Operations* Date *22 March 2017*