



Modern Slavery and Human Trafficking Statement June 2022



Introduction

Medefer Limited is committed to acting ethically and with integrity in respect of all its business activities. The Company adopts a zero-tolerance approach to modern slavery and human trafficking throughout all of its business dealings and expects its suppliers and relevant stakeholders to adopt a similar approach. In doing so, the Company endorses full compliance with relevant laws through the implementation and promotion of ethical business practices to protect workers from being exploited both within Medefer and its supply chains.

This statement outlines the potential risks and significant steps adopted by the Company to ensure that modern slavery or human trafficking does not occur in Medefer and/or any of its supply chains.

This statement applies to all employees, workers or any persons working for us on our behalf in any capacity, including agency workers, contractors, external consultants, third-party representatives and business partners.

Organisational Structure and Supply Chains

Our specialist Consultants work online to help our NHS partners to reduce patient waiting times and create a more sustainable outpatient service.

Using our software platform, GP referrals are reviewed and managed online by our team of UK-registered, specialist Consultants, so patients don't have to wait for an in-person hospital appointment.

We support patients from their initial referral from their GP and review their situation to identify the need for further investigation, in order that they can be treated and discharged, often without the need for physical outpatient appointments.

We work closely with the NHS and Medefer is now included in the NHS England Increasing Capacity Framework.

Medefer Limited expects any suppliers/contractors with whom they conduct business with to adopt similar high standards in the pursuit to prevent modern slavery or human trafficking by having a Modern Slavery and Human Trafficking statement or policy in place. As and when the Company engages in business dealings with new suppliers/contractors, the Company undertakes due diligence to ensure there is no modern slavery or human trafficking activity occurring both within the business or any of its supply chains.

Responsibility

The CEO has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all employees comply with the policy.

The CEO has responsibility for implementing and reviewing this policy and monitoring its use and effectiveness.



Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all employees and contractors to complete online training courses every three years on the topic of safeguarding. The courses we allocate contain modules on Modern Slavery whether it is Safeguarding level 1, 2 or 3.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Freedom to Speak Up Policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- **Code of Conduct** - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- **Health and Safety Policy** - The Company's H&S policy summarises how we manage our environmental impacts and how we work responsibly and safely whether that is in an office environment or at home.
- **Staff Recruitment Policy** – If the Company uses employment agencies, we always verify the practices of any new agency used prior to accepting employees from that particular agency. Medefer Limited's recruitment and selection procedures includes appropriate pre-employment screening of all potential employees to determine their right to work in the UK.

Due Diligence Processes for Slavery and Human Trafficking

Medefer Limited is actively undertaking due diligence when considering taking on new suppliers/contractors. Medefer's due diligence approach includes:

- Obtaining verification that any new suppliers/contractors have a Modern Slavery and Human Trafficking statement or policy in place;
- Ensuring any form of child labour or exploitation is not present in any part of the business or its supply chain;
- Providing protection for whistleblowers;
- Ensuring employees are paid at least the National Minimum Wage or National Living Wage, depending on their eligibility;
- Ensuring the absence of all forms of discrimination in any aspect of the business or its supply chain, including recruitment and selection procedures, access to training and promotions etc.;
- Ensuring right to work and pre-employment checks of all staff are conducted appropriately;



- Ensuring no harsh or inhumane treatment is allowed in any part of the business or its supply chain in line with the Company's Equal Opportunities Policy;
- Using only specified, reputable employment agencies to source labour, and verifying the practices of any new agency prior to sourcing labour from that agency;
- Ensure staff are aware of the procedure to follow, should they have concerns regarding any circumstances which may give rise to an enhanced risk of slavery or human trafficking in any part of the business or its supply chain;
- Ensuring working hours are not excessive and are fully compliant with the Working Time Regulations 1998.

Performance indicators

The Company will regularly review and develop its policies, procedures, systems and controls to ensure it remains committed to preventing slavery and human trafficking in any part of its business or its supply chain.

Medefer has not been informed of any incidents of slavery or human trafficking during the year, however, will investigate any allegations should they arise and take necessary action accordingly.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Bahman Nedjat-Shokouhi

Position: CEO

Date:

Signature: