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## **MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT**

### **Paul HARTMANN Ltd (UK)**

#### **INTRODUCTION**

Paul HARTMANN Ltd is a provider of Wound Care and Incontinence products in the UK and is part of the HARTMANN GROUP.

The HARTMANN GROUP began Going Further for Health in 1818, when industrial pioneer Ludwig von Hartmann acquired the Meebold spinning mill. His son, Paul Hartmann Sr., later founded the Paul Hartmann Bleaching, Dyeing and Dressing Company, a dressing material factory that revolutionised wound care. Our founding fathers were more than industrial pioneers, however. They instilled a drive, optimism and commitment to improving healthcare that lives on in the business to this day.

Thanks to them, we are still innovating and actively seeking to improve healthcare through: Wound Management, Disinfection, Risk Prevention, Continence Management and Personal Healthcare.

In 1981 Paul HARTMANN AG acquired a chemist wholesaler/ importer in London and Paul HARTMANN Ltd was established.

#### **ORGANISATIONAL STRUCTURE AND SUPPLY CHAIN**

The UK organisation is split into two divisions:

- Wound Management
- Continence Management

Both areas are supported by central functions such as Finance, Supply Chain, Customer Services, Marketing, IT and Human Resources.

Our Supply Chain includes the sourcing of finished goods from HARTMANN production sites in Europe (Switzerland, Spain, Germany, France) or from 3<sup>rd</sup> party product suppliers in Europe.

## **OUR POLICIES**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any other part of our business.

Our actions are based on the principles outlined in the UN Global Compact, International Labour Organisation (ILO) Conventions, UN Declaration of Human Rights, OECD Guidelines for multinational companies.

Every HARTMANN employee must commit to the highest standard of integrity and ethics.

We operate the following policies to prevent slavery and human trafficking in our operations:

- Code of Conduct
- Supplier Controls
- Whistleblowing
- Recruitment
- Code of Practice Guidelines for Sales and Marketing
- Anti - Bribery and Gifts

## **DUE DILLIGENCE**

We assess risks of modern slavery when taking on board new suppliers.

If a supplier is not compliant with the following regulations, the selection procedure must be stopped:

- Universal Declaration of Human Rights of the United Nations and the OECD
- Core labour standards of the ILO (forced labour, child labour)
- Anti- Trust and Competition Laws
- Environmental Protection Laws
- Anti- Corruption Laws and Ethical Standards

In a second step, a risk profile of the supplier is created by considering supply chain, operational, organisational and country risks.

The performance of our suppliers and the risks of modern slavery and human trafficking are reviewed on a regular basis.

## **TRAINING**

Every employee must undergo compulsory annual training on the HARTMANN Code of Conduct.

This statement and the risks of modern slavery and human trafficking are communicated to all members of staff and further training is provided to relevant employees.

This statement is made pursuant to section 5(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

This statement has and will be reviewed and updated as necessary on an annual basis

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Date: 4/1/2021

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Position: Managing Director

Approval Signature:  DA02BAE7E7AA401...

Date: 4/1/2021

Approval Name: Trevor Coupe

Position: Finance Director