

Modern Slavery Statement 2024

Willingsford Limited (“WF”) is making this statement in accordance with its commitment to meet section 54 of the Modern Slavery Act 2015 (“MSA”).

This statement covers the reporting period 1 January 2023 and 31 December 2023 and outlines the aims for the period between 1 January 2024 and 31 December 2024.

WF is committed to preventing modern slavery and human trafficking in any part of our business or supply chain, and we aim to take sustained and concerted action against such acts.

Organisation structure and supply chains

WF is a UK-based medical device company, and the majority of its suppliers are associated with the pharmaceutical and the medical device industry. This industry is highly regulated and the majority of companies undergo regular regulatory inspections and certifications. The workforce is typically highly educated.

Policies in relation to slavery and human trafficking

WF recognises its responsibility to operate our business with effective policies and procedures and its approach is based on the Modern Slavery Act 2015 and Procurement Policy Note issued by the Cabinet Office ([PPN02/23 – Tackling Modern Slavery in Government Supply Chains](#)), which together provide a comprehensive overview of the roles and responsibilities of the commercial practitioner in assessing and mitigating the risk of modern slavery in the supply chain.

Due diligence processes

The WF approach to due diligence and assessment of modern slavery risk within the supply chain is based on a tiered approach, where key suppliers are evaluated based on the potential level of modern slavery risk using the following criteria:

- Industry Type – for example those that involve raw materials and / or are labour intensive
- Nature of Workforce – for example reliance on temporary or low skilled labour
- Supplier Location – some countries have a higher predicted risk of modern slavery
- Context in which the Supplier Operates – for example high levels of poverty and unemployment
- Commodity Type – for example imported products as identified in the Global Slavery Index
- Business / Supply Chain Model – for example sub-contracting and complex supply chains.

In the past, no key supplier was identified to be considered to fall within these criteria given the business area in which WF operates.

In the event of modern slavery practices being identified within our supply chain and the use of modern slavery practice is confirmed, WF will identify an alternative supplier. The supplier in breach of regulation may be brought to the attention of appropriate authorities.

Risk assessment and management

Although the risk is determined to be low, modern slavery risks are reevaluated when new contracts are placed with the supplier or if new information comes to light.

Key activities undertaken during this reporting period to address our Modern Slavery risk

The following steps were taken during this reporting period to further enhance our approach to modern slavery.

- We have concluded a review of our risk assessment in relation to all aspects of modern slavery, including any new risks arising due to global or UK events. This has included an update based on the [Procurement Policy Notice 02/23](#).
- We have included a consideration and possible review as a permanent agenda point on Management Review Meeting to ensure that the MSA is considered regularly.

Training on modern slavery and trafficking

Awareness of modern slavery and the risks it poses to WF and its supply chain is essential and all staff are made aware of the following resources:

- Crown Commercial Services Modern Slavery Workshops – specifically for procurement and supply chain practitioners: <https://www.crowncommercial.gov.uk/social-value/modern-slavery>
- Government Commercial College Training – <https://www.gov.uk/government/publications/civil-service-helping-you-with-managing-suppliers-and-contracts>.

Aims for the reporting year 2024

We aim to incorporate to the MSA into our daily activities involving suppliers and customers and to ensure alignment with Cabinet Office guidance. The inclusion of the MSA as a permanent agenda item on Management Review Meetings will support this aim.

This statement was approved on April 20, 2024 by the WF Board of Directors.

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