

# Modern Slavery Act 2015: Slavery and Human Trafficking Statement – IDH Group

## INTRODUCTION

This statement sets out our actions to understand the potential modern slavery risks related to the business and to continue to ensure action is taken aimed at ensuring that there is no slavery or human trafficking in the business and its supply chains.

## ORGANISATIONAL STRUCTURE

We are Europe's largest vertically integrated dental business with over 600 dental practices nationwide in addition to which we supply dental and other medical consumables, materials and services. Our ultimate parent company is Turnstone EquityCo 1 Limited which has its head office in England. We have over 7,100 employees and operate in England, Scotland, Wales and Northern Ireland.

## RELEVANT POLICIES

We operate the following policies which set out our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Anti-slavery Policy** - We have an Anti-slavery and Human Trafficking Policy which is reviewed annually and reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The policy applies to all employees and persons working for us in any capacity. It explains the nature of Anti-slavery and Human Trafficking, the reason to operate the policy, and to whom the policy applies. It also clearly sets out how to report any concerns about Anti-slavery or Human Trafficking.

**Whistleblowing policy** - We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. We have had no reports regarding Anti-slavery and Human Trafficking during the period covered by this statement.

**Employee expectations** - The organisation makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we have in place processes to:

- Mitigate the risk of slavery and human trafficking occurring in our supply chains, including ensuring compliance with the Modern Slavery Act 2015 is a condition of all of our supplier contracts.
- Protect whistle blowers.

## **TRAINING AND AWARENESS**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will continue to raise awareness of modern slavery issues for all relevant staff and in particular:

- the basic principles of the Modern Slavery Act 2015;
- how employees can identify and prevent slavery and human trafficking; and
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation and in accordance with Whistleblowing policy and procedure.

## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We ensure all relevant staff are made aware of the basic principles of the Modern Slavery Act 2015 and know how to flag any concerns to the business.

In addition, we continue to review supply chains and, where necessary, contact suppliers to ensure that they agree to comply with the requirements of the Act and the Group's policy.

Following a review of the effectiveness of the steps we have taken to ensure there is no modern slavery or human trafficking in our supply chains, we intend to take the following further steps:

- review our supplier due diligence processes;
- review our recruitment processes;
- ensure that training is updated and all relevant staff continue to be made aware of the principles of the Modern Slavery Act 2015 and its relevance to their role

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2019.



**Tom Riall**

IDH Group, Chief Executive Officer

Date: 30<sup>th</sup> September 2019

