

# 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 circa 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 6,600 employees and operate in England, Scotland, Wales and Northern Ireland.

## RELEVANT POLICIES

We operate the following policies and procedures 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 and Human Trafficking Policy** – This policy 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 slavery or human trafficking.

**Whistleblowing Policy** - We encourage all of 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 Policy is designed to make it easy for workers to make disclosures, without fear of retaliation. We have had no reports regarding slavery or 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 initiatives 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; and
- protect whistleblowers.

## **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 organisation, 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 the Whistleblowing Policy.

## **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 organisation.

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 Modern Slavery Act and the Group's Anti-slavery and Human Trafficking Policy.

We continually review of the effectiveness of the steps we have taken to ensure there is no modern slavery or human trafficking in our supply chains, and we periodically undertake the following further steps:

- review our supplier due diligence processes;
- review our recruitment processes; and
- ensure that training is updated annually and that all relevant staff continue to be made aware of the principles of the Modern Slavery Act 2015 and its relevance to their role as well as the provisions of the Group's Anti-slavery and Human Trafficking Policy.

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 March 2020.



**Tom Riall**

IDH Group, Chief Executive Officer

Date: 30<sup>th</sup> September 2020