

SHARON SERVICES (UK) LTD

MODERN SLAVERY

STATEMENT



DO THE RIGHT THING



Sharon Services (UK) Ltd is a company registered in Scotland no. SC422640

MODERN SLAVERY



Modern slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, forced and compulsory labour, child labour and human trafficking.

Our annual turnover is approx. £4 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act.2015, we at Sharon Services (UK) LTD. are committed in identifying Modern Slavery risks across our business which include, slavery, human trafficking, child labour and forced/compulsory labour.

Our commitment of acting ethically and with integrity extends to all of our relationships along the supply chain. We ensure that all of our partners share our view in implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our recruitment and people management systems ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

Voluntary Slavery and Human Trafficking Statement

We are committed to improving our practices to combat modern slavery in our business by taking steps, as far as we are able, to ensure that our supply chains are free from slavery and human trafficking.

This statement sets out the steps we have taken and/or plan to take between May 2024 to May 2025 to understand potential modern slavery risks within our business structure and supply chain, and as well as the steps taken to eradicate these risks.

About us

We are a small business that manufactures goods in Turkey and China, for provision to primary healthcare, social care and retail sectors in the UK and Europe. Our annual turnover is under £36 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act.2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to identify risks and tackle modern slavery and human trafficking in our business and in our supply chains.

As a responsible company, we understand and monitor the potential risks in production and provision of raw materials, to product manufacturing, international shipping, haulage and warehouse operations. On that basis we take a proactive, preventative and reactive approach to risk mitigation.

Our commitment to ethical trading

We are committed to ethical trading principles and to acquiring goods and services without harm to others.

Sharon Services (UK) Ltd. supplies Healthcare products to the UK market and we require suppliers within our supply chain to implement and comply with local laws and legislation including the Labour Standards Assurance System (LSAS) where applicable. We share this ethical policy with relevant suppliers.

Senior Management support LSAS where applicable with operation responsibility falling to the Sales, Purchasing & Quality management. LSAS requirements will be communicated internally and externally to relevant stakeholders. Suppliers must do the same throughout their own business. Appropriate training and guidance will be provided to support the implementation of LSAS to relevant staff. Suppliers must not engage in unethical practices such as bribery or corruption.

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Written by: Clayton Coelho / Approved by: Board

Date: 03.04.24 / Review: 02.04.2025



Sharon Services (UK) Ltd. commits to monitoring relevant performance against LSAS requirements through risk assessments, self-assessment questionnaires, audits and site visits where applicable. We will work together with relevant suppliers to identify corrective actions to demonstrate on-going commitment to continuous improvement.

Should any suppliers or employee within the company, have any concerns regarding ethical and/or labour standards within the supply chain, they should direct their concerns to the senior management and it will be dealt with in the strictest confidence.

Due diligence and risk assessment

Sharon Services (UK) Ltd. operates a stringent vetting, audit and monitoring programme to ensure all external providers of commodities, goods and services conform with the high standards expected of our supply chain. Our supplier selection and on-boarding procedure includes due diligence of the suppliers reputation, respect for the law, compliance with health, safety and environmental standards, and references.

As part of the due diligence we carry out the following of the new suppliers:

- Assessing risks in the provision of services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Cease working with suppliers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

The following procedures and practices form part of the external checks made by company representatives. In the first instance, the following documents are issued to the supplier's lead representative during pre-registration vetting:

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- Modern Slavery Statement and Policy Overview
- Ethical Purchasing Policy
- Sustainable Sourcing, Supplier Code of Conduct

The prospective supplier is issued with a 'New Supplier Set-up Form' in order to collect general details for internal administration. This form is also used as a self-certification exercise to request further details on any relative accreditations to recognised standards.

It also lists the main policy areas for Modern Slavery KPI's and asks the supplier to confirm that they understand the information presented and are happy to confirm acceptance to Sharon Services requirements.

On receipt of a completed Supplier Set-Up Form and self-declaration, we will evaluate the information provided and decide on a range of further steps to take which may include:

1. Assess the business services rendered by the suppliers
2. Assess the presence of vulnerable demographic groups
3. A news analysis and the insights of labour and human rights groups
4. Further assessment of existing auditing and monitoring documentation which the supplier may have in place
5. Arrange for an independent 3rd party inspection and audit of their premises/facilities, to cover welfare of staff, including impartial interviews of staff members and other key investigations
6. Request for information on training materials, processes and monitoring procedures of the supplier organisation to check for conformity with expected standards
7. After completion of the assessment process, agree suitable remedial actions or arrangements as required, to bring the supplier in line with company standards

A report will be compiled to outline the suitability of the supplier organisation, to present to the Commercial Director. A decision will be made as to the suitability of the supplier to deliver on the requirements of a specific contract or service. Quarterly or annual reviews may be conducted to ensure ongoing compliance with company policies and procedures. After each review, notes will be filed against the supplier's profile and future review dates will be diarised with alerts in company calendars against the person of responsibility in this area.

Reviews may feature other actions such as unannounced inspections of premises, facilities and company records. Communication of our inspection of Management Information relative to the supply agreement/contract.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- The number of reported breaches in the past year.
- Percentage of staff receiving training on identifying and addressing the risk of slavery and human trafficking in our business and supply chains.

Policies:

Sharon Services (UK) Ltd. operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- Purchasing Code - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

Awareness:

Sharon Services (UK) Ltd. has raised awareness of modern slavery issues by sending an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training:

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

Working with Slave Free Alliance (SFA), we deliver Modern Slavery Awareness Training to staff members in senior leadership and those with a role in procuring goods and services.

SFA & Hope for Justice offer a cutting-edge human trafficking training package to professionals across the globe.

The training educates participants on what constitutes modern slavery in all its forms, highlights the signs of trafficking, and explains what action(s) should be taken in response to a suspected case. A statement on the success of this initiative from SFA is as follows;

The training strategy has lead to increased levels of identification and potential victims who are referred to SFA on a regular basis by recipients. In 2018/2019, 58% of the referrals of potential victims to Hope for Justice for investigation came from organisations directly trained by Slave-Free Alliance & Hope for Justice staff.

In 2019, SFA & Hope for Justice trained over 16,000 people globally and is seeing increasing interest from businesses, statutory agencies and government bodies.

Businesses who have had our training include Aviva, Royal Sun Alliance, Barclays, Next and Severn Trent plus many others.

In December 2018, Hope for Justice's Training team won a prestigious award, being named Best Public Service / Not-for-Profit Programme at the annual Training Journal Awards. The Awards recognise "the very best practitioners in the field of learning and development today".

From the award; "the judges were impressed by all aspects of this programme. The context for introducing new methods of raising awareness of modern slavery are highly relevant in today's society and this allowed the team to set very clear objectives. There were examples of innovation and creativity on the delivery through a variety of specifically designed tools".

Hope for Justice was shortlisted alongside some of the biggest public sector brands in the country, including the NHS and the Cabinet Office, thus winning the prize was an excellent achievement and speaks to the quality and influence of the training programme Slave-Free Alliance offer.

This training programme features high-quality training videos and interactive polling and ensures that staff:

- Understand what modern slavery is and how it occurs in the UK and around the world
- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation

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- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps we will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by our anti-slavery policy

This voluntary slavery and human trafficking statement is made for the financial year ending April 2025. It was approved by The Directors on 03/04/2024.

A handwritten signature in black ink, appearing to read "Clayton Coelho".

Clayton Coelho

Commercial Director

Date: 03/04/2024