

The Blatchford Group:

Parent company and wholly owned subsidiaries



Operates **inside** and **outside** of the UK

Advanced Technology and Patient Solutions

£106m turnover

Global Supply Chain Networks

Transparent & Fair

Protecting Human Rights

Minimum Wage Working Time Directive

Risk Assessment

Our Values



Integrity



Innovation



Collaboration



Learning



Courage

Blatchford Ltd

This policy statement summarises the underlying framework for Human Resources, Human Rights and Labour Standards as approved and published internally for Blatchford Group Ltd.

Principle

Blatchford Group's principal asset is our people and commitment to provide a consistent and quality service to our customers. As such the Group recognises the relationship between poor labour standards and poor service levels. We are committed to ensuring the Group and its suppliers achieve the acceptable labour standards at all times. In conducting its business and striving to meet its corporate aims, our employees and directors will adopt the following principals:

- Exercise honesty and diligence in performing their duties and undertaking their responsibilities
- Maintain high standards of integrity, morality and competence
- Not contravene national laws and relevant regulations in the conduct of their duties
- Not enter into any activity which may result in a conflict of interest with the company
- Not accept anything of value which could be described as an inducement or which could impair their judgement
- Not use the company's confidential information for personal gain
- Not act in a manner which would discredit the company, customers, or suppliers
- To operate an ethical workplace
- Be loyal in all matters affecting the company, including matters relating to customers and others with whom the company has a commercial relationship
- Not permit any act by an employee that is considered to be corrupt, either under relevant law or by reference to good business practice.

Fairness and Human Dignity

Blatchford commits to providing a working environment where employees are recognised as our most valuable asset, and are treated with respect, dignity, and consideration. This commitment is built on a framework of policies and procedures designed to ensure fairness in recruitment, retention, reward, training and development of all employees.

Discrimination

Our policies for recruitment, selection, training, development and promotion are designed to ensure that no applicant or employee receives less favourable treatment on the grounds of age, race, colour, nationality, ethnicity, religion, gender, marital status, disability, gender orientation or offending background that does not create any risk to the company, colleagues, vulnerable adults or children.

Subject to the need to ensure necessary protection as above, we make every effort to prevent discrimination against those with criminal records.

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- All recruitment procedures are designed to encourage applications from all sections of the community and with all abilities.
- We ensure application processes are user friendly and avoid unnecessary barriers.
- We will continue to identify underrepresented, disadvantaged or excluded groups.
- Equal opportunities data is collected, analysed, and used to inform planning and decision-making processes.

Human Rights

- Each person that works with Blatchford shall be treated with dignity and not subjected to any harassment, physical or mental punishment or other forms of abuse
- We promote effective engagement through our business and welcome open and sincere feedback from all colleagues of all matters of the company's business interests
- There is an effective grievance management process in place, which is transparent, and equitable to enable the remediation of any abuse of human rights and the impacts of the same

Child Labour and Forced or Compulsory Labour

- Blatchford does not and will not engage in or support the use of child labour. If we engage any young workers, e.g. on work experience, we ensure that a suitable risk assessment is carried out and that the young person is not subject to any hazardous conditions or work of more than seven hours a day
- We adhere to and strictly comply with international child labour conventions and Child Labour Laws
- Blatchford will not engage or support the use of forced or compulsory labour, or bonded, or involuntary prison labour. Employees are free to leave after providing reasonable notice in line with their individual contracts of employment. All employees provide their service to the company on an entirely voluntary basis and no-one shall be forced to remain in the employment of the Group against their will.

Freedom of Association

- We believe in the power of direct engagement with our employees. Whilst we do not formally recognise a Trade Union or a collective representative body (except in our operations in Norway), we recognise and respect the right of our employees to freely associate with any organisations which exist to further and defend their interests in the workplace
- Our employees shall not be dismissed or otherwise prejudiced for reason on membership of such an employee organisation or because of participation in that organisation outside of working hours, or, with the consent of their line manager, in working hours.
- Our employees shall enjoy protection against discrimination by virtue of their membership of an employee organisation and employment

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shall not be conditional on an employee joining or not joining or relinquishing membership of such an organisation

Health and Safety

Blatchford Group is committed to ensuring the health, safety, and welfare of its employees, so far as is reasonably practical. We also fully accept our responsibility for other persons who may be affected by our activities. We will take steps to ensure that our statutory duties are always met and that there are progressive improvements in health and safety performance. It is Blatchford Group policy, as far as is reasonably practical, to:

- Provide safe systems of work
- Provide and maintain safe plant and equipment
- Provide a safe place to work with safe access and egress
- Provide for the safe use, handling, storage and transport of all articles and substances used
- Provide a safe working environment
- Provide adequate and sufficient information, training, instruction and supervision

Working Hours and Periods

Blatchford shall comply with all applicable laws and industry standards on working hours and holiday entitlements

Remuneration

We shall comply with national laws and regulations regarding wages and benefits in all our business operations. All work-related activities are carried out on the basis of a recognised employment relationship established according to national law and practice.

Responsibilities and Raising of Concerns

- The implementation and monitoring of this policy is the responsibility of Blatchford's Directors
- Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy
- Employees and associated persons are required to notify Blatchford as soon as possible if it is believed or suspected that a conflict with this policy has occurred or may occur in the future, or that they are a victim of another form of unlawful activity.
- This policy is relevant to the company itself, our contractors, sub-contractors, suppliers, freelancers, and other parties engaged with Blatchford. We reserve our right to terminate our contractual relationship with any third-party suppliers if they breach this policy
- All persons engaged with Blatchford shall ensure they read, understand, and comply with this policy. They are required to avoid any activity that might lead to or suggest a breach of this policy

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- Employees shall notify their manager or director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future
- If a breach of this policy is believed or suspected to have occurred, the employee shall notify a manager or director or report it in accordance with our whistleblowing policy as soon as possible
- Blatchford is committed to ensuring no-one suffers any detrimental treatment as a result of reporting in good faith their suspicion of a breach of the minimum standards

Communication and Awareness of this Policy

- Training on this policy, and the risk the company faces from a breach of modern slavery obligations in its supply chains will form part of the induction process for all individuals who work for us, and training will be provided as and when necessary
- Blatchford shall endeavour to communicate the policy as appropriate to its suppliers, contractors, and business partners at the outset of our business relationship and reinforce as appropriate thereafter
- Blatchford shall make this policy publicly available (specifically via its website (www.blatchford.co.uk)) and the policy will be communicated to all employees and to all contractors, sub-contractors and suppliers

Breaches of this Policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Review of the Policy

The effectiveness and implementation of this policy will be reviewed as deemed appropriate, but no less frequently than every 12 months. The review will be undertaken by the Directors of Blatchford Group.

The company commits to periodically reviewing this policy to continually improve labour standards within the workplace. The company shall take into consideration changes in legislation, legal advice as and when necessary, to ensure the adequacy, suitability and continuing effectiveness of this policy.

Paul Roberts
CEO, Blatchford Group
November 2023