

Opal Disposables Limited Modern Slavery Policy

1. Introduction

- 1.1 At Opal Disposables Ltd, we recognise that modern slavery and human trafficking are serious violations of human rights. Modern slavery takes many forms, including forced labour, servitude, and human trafficking, all of which involve the exploitation of people for personal or commercial gain.
- 1.2 We are committed to a zero-tolerance approach to modern slavery in all our business dealings. We take responsibility for ensuring that no part of our business or supply chain is involved in any form of modern slavery. We aim to operate with transparency, integrity, and high ethical standards, actively working to implement controls and processes that prevent such practices.

2. Our Business and Supply Chains

- 2.1 Opal Disposables Ltd is a manufacturer and supplier of disposable curtains, cubicle tracks, and blinds. Our business supplies to the NHS and the private medical sector.
- 2.2 Our operations involve partnerships with multiple suppliers for raw materials, manufacturing components, and distribution services. We are committed to ensuring that slavery and human trafficking are not present in any part of our supply chains.
- 2.3 The company directors take overall responsibility for the effectiveness of our modern slavery policy, ensuring compliance with ethical and legal standards. Our office manager is responsible for the day-to-day implementation, monitoring, and effectiveness of our modern slavery prevention systems.

3. Our Policies on Modern Slavery

- 3.1 We believe that respect for human rights is an essential part of our responsibility as a business. Our commitment to combatting modern slavery aligns with the Modern Slavery Act 2015, and we expect our suppliers to meet the same high ethical standards.
- 3.2 Our modern slavery policy prohibits the use of forced labour, child labour, and any form of servitude. All suppliers must agree to these prohibitions and ensure compliance throughout their own supply chains.
- 3.3 Our employees, suppliers, contractors, and third-party partners are all required to comply with this policy, and we maintain a transparent, responsible approach to human rights across our entire operation.

4. Due Diligence Processes

- 4.1 We have established due diligence processes to identify, prevent, and mitigate risks of modern slavery within our business and supply chains.
- 4.2 As part of our procurement process, we assess all new and existing suppliers for compliance with our modern slavery policy. Suppliers are required to complete a due diligence questionnaire, confirming their adherence to human rights standards.

4.3 We perform audits and monitor supplier practices on an ongoing basis. Any supplier found to be in breach of our modern slavery policy will face immediate review, with corrective actions taken or termination of business relations if necessary.

5. Risk Assessment and Management

- 5.1 We recognise that certain parts of our business and supply chain may carry higher risks of modern slavery, particularly in the sourcing of raw materials and transportation services.
- 5.2 We conduct regular risk assessments to identify and manage these risks, focusing on high-risk suppliers, countries, and industries. This helps us to prioritise our efforts in preventing human trafficking and forced labour.
- 5.3 We are also committed to working collaboratively with our suppliers to manage risks and develop more sustainable and ethical supply chains.

6. Measuring Effectiveness

- 6.1 To ensure the effectiveness of our approach, we have established key performance indicators (KPIs), including:
- The number of suppliers audited for compliance with modern slavery regulations.
- The percentage of suppliers completing the due diligence process.
- The number of reported incidents or suspicions of modern slavery within our business or supply chain.
- 6.2 We review these indicators annually to measure our progress and improve our practices. Our goal is to ensure that modern slavery has no place within our business or supply chains.

7. Training and Capacity Building

- 7.1 All employees are trained on our modern slavery policy and the risks associated with human trafficking in our supply chains. This training is incorporated into the induction process and updated regularly.
- 7.2 We communicate our zero-tolerance approach to modern slavery to all suppliers and contractors from the outset of our business relationship and continue to reinforce this throughout our engagement.
- 7.3 Employees and supply chain partners are encouraged to raise concerns or suspicions related to modern slavery, with the assurance that these will be addressed promptly and without any form of retaliation.

8. Transparency and Continuous Improvement

- 8.1 We are committed to transparency in our efforts to tackle modern slavery and human trafficking. Our modern slavery statement is reviewed annually and updated to reflect any improvements or changes to our practices.
- 8.2 We understand that addressing modern slavery requires continuous effort and collaboration. We remain committed to working with industry partners, suppliers, and stakeholders to drive improvements across the sector.
- 8.3 As part of our broader corporate responsibility, we will continue to assess our policies, procedures, and partnerships to ensure they align with best practices in combating modern slavery.

9. Breaches of Policy

9.1 Any employee found in breach of this policy will face disciplinary action, up to and including dismissal. Similarly, any supplier found to be involved in modern slavery will face immediate termination of business relations.

Signed Maurice Laydon Director 12.06.2024

Maurice Laydon

Managing Director