

## **Vernacare International Modern Slavery Act**

October 2024

The ethical compliance of Vernacare International and its supply chain is one of the founding principles on which the company, and its subsidiaries, conduct trade.

Vernacare employs dedicated and trained staff to ensure that the 11 basic principles of the International Labour Office for forced labour are monitored and controlled, and that other ethical standards are communicated and upheld within the company. Ethical policies and performance are reviewed as key components of the annual management review as a minimum.

Vernacare recognize the 11 basic principles that indicate forced labour as:

1. Abuse of vulnerability
2. Deception
3. Restriction of Movement
4. Isolation
5. Physical and Sexual Violence
6. Intimidation and Threats
7. Retention of Identity Documents
8. Withholding of Wages
9. Debt Bondage
10. Abusive Working and Living Conditions
11. Excessive Overtime

Vernacare International do not advocate practices within its premises or supply chain which compromises the safety and wellbeing of the labour force. Support is provided direct to the supply chain for ensuring the principles of ethical trade and modern slavery are communicated and understood, with free training presentations made available to the supply chain via the company website at [www.vernacare.com/environmental-ethical-policy](http://www.vernacare.com/environmental-ethical-policy)

Additionally, Vernacare actively promotes the Ethical Trade Initiative (ETI) Base Code which also crosses over many of the same founding principles, and holds a level 4 status to LSAS at its Workstop site, the highest level awarded for a labour scheme.

All Tier 1 suppliers in high-risk countries undergo an Ethical Audit by the Vernacare team, or a selected third party. This ethical audit consists of Health & Safety, Employment Law and Compliance, as a minimum, to the Ethical Trade Initiative (ETI Base Code) which details requirements of forced or bonded labour in respect to Modern Slavery.

Audits are carried out on a regular basis according to the risks associated with the products supplied, and the location in which the supplier resides. The results of these audits are communicated between Vernacare and the supply chain, and we work proactively to ensure any areas for improvement are carried out and that the

requirements of the ETI base code are not only implemented but understood in full. As the company expands the number of sites to audit will increase into other countries of Medium Risk and Low Risk, a process which is expected to be completed within the next 5 years.

Under the LSAS scheme all critical suppliers have a copy of the Vernacare Whistle Blowing Policy, written in the native language, thus allowing concerns over safety, or product quality, to be raised anonymously to the Vernacare team by any supply chain worker. We actively encourage our supply chain to be familiar with the ETI base code and assist in directing them to the relevant information in their native language. Whistle blowing is used anonymously for the benefit of any worker who feels they may be the victim of Modern Slavery

Internal procedures exist on the auditing and investigation of the supply chain. Where possible, education of Modern Slavery and ethical standards will be promoted as the first corrective action where a breach is identified. This will allow the supply chain to strengthen rather than dismissal of a supplier which may prevent resolution of the breach and keep the identified risk prevalent within the sector. Where improvements are not seen, or serious breaches which affect the safety and wellbeing of supply chain workers are identified, these may be reported to the local authorities as required.

We engage the services of local representatives in the high-risk areas of the supply chain, so that issues and concerns may be raised directly with the representative. This allows a more proactive approach to Ethical and Quality compliance, rather than rely entirely on an audit scheme.

*Richard Hall*

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Chief of Operations



Steph Summerfield  
Labour Standards Representative

*Darren Edwards*

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