

MODERN SLAVERY ACT 2015 - STATEMENT

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the Policy

The Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Director has primary and day-to-day responsibility for implementing this policy, monitoring its effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

On the appointment of managers they are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on the issue and the issue of modern slavery in supply chains.

Compliance with the policy

You must ensure that you read, understand and comply with this policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise any concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your

manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether an incident, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with the Director.

We aim to encourage openness and will support anyone who raises concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern day slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Communication and Awareness of this Policy

Training on this policy, and on the risk the DTC faces from modern day slavery in its supply chains forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter

For transparency the Group will publish the Modern Slavery Act 2015 Policy Statement on its websites for the public, consumers, employees, NGOs or investors to view. ([Appendix 1](#))

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

APPENDIX 1

Modern Day Slavery Act 2015 Policy Statement

DTC recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Group is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

Our Business

DTC activities are varied through multiple disciplined areas and sectors such as: ISO Consulting, preparing for audits, maintenance of management systems and supply chain management including sourcing and supplying medical consumables and personal protective equipment.

And likewise, we have a multi-disciplined supply chain to support us through the different aspects and

provisions of our business.

Our Policies

We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy Statement 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.

This statement takes into account, and supports, the policies, procedures and requirements documented in our Management System, compliant with the requirements of ISO 9001:2015. The implementation and operation of this management system underlines our commitment to this policy statement.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our Suppliers

The DTC operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

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 relevant members of staff.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within DTC or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified

Approval for this Statement

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

For transparency the company will publish the Modern Slavery Act 2015 Policy Statement on its website for the public, consumers, employees, NGOs or investors to view.

This statement was approved by the the Borad of Directors 20th June 2021