

IVC Brunel Healthcare

Modern Slavery and Human Trafficking Policy Statement

Overview

IVC Brunel Healthcare is a food supplement manufacturer based in Derbyshire, UK. Brunel sources raw materials from across the world. We manufacture the majority of products ourselves in Derbyshire and commission some specialist products to be manufactured in carefully selected and approved partner sites.

In accordance with section 54(1) of the UK's Modern Slavery Act 2015 this statement sets out IVC Brunel's commitment to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain and our products.

Underpinning Brunel's approach to working against any acts of modern slavery is our support of the SEDEX ethical trading initiative. We take our commitment to human rights seriously and take steps to verify, evaluate and address risks at our UK site and in our supply chain. All members of our manufacturing supply chain have annual Ethical (SMETA) Audits.

IVC Brunel recognises that slavery and human trafficking can occur in many forms: *Forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. There shall be no unreasonable restrictions on workers' freedom of movement. As part of the hiring process, workers must be provided with a written employment agreement that contains a description of terms and conditions of employment. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity of immigration documents, such as government issued identification, passports or work permits, unless the holding of work permits is required by law. Workers shall not be required to pay employers or agent's recruitment fees or other aggregate fees in excess of one month's salary. All fees charged to workers must be disclosed.*

Policies

IVC Brunel have policies in place to ensure that we only form contracts with UK agency labour providers that are Gangmaster Licensing Authority (GLA) registered. The agency labour providers are required to sign service agreements and are regularly audited by ourselves and checked on the Government Gateway website twice yearly. All interviews are conducted face to face and all staff supplied shall be legally entitled to work in the UK. Separate policies focussed on suppliers and their operating standards are also in place to support positive practices throughout the supply chain.

Verification, Audits and Certification of Supply Chain

We view assessments and audits as integral parts of our overall supplier management process. They help us identify compliance gaps where immediate action is needed, and root causes that enable development of systematic solutions and improvements. These steps are thoroughly investigated before any new supplier is approved and also on an ongoing basis to ensure consistent quality of service and supply.

Our supplier verification process involves a mixture of assessments of all our suppliers, following a risk based approach to determine frequency of review. If the site is registered on SEDEX with the Self-Assessment Questionnaire they must provide us with their SEDEX membership number

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and link. This questionnaire assists us in determining the risk profile of our suppliers for Health & Safety and Human Rights.

Any suppliers identified as higher risk are either immediately discounted or undergo an audit and/or capability assessment. The audits are performed using one of two methods: (1) an on-site audit performed by qualified, independent third party auditors or (2) an on-site audit performed by Brunel auditors. These audits are performed against the ETI base code or a targeted portion of the code and our specific compliance concerns. Audits are scheduled with the supplier in advance. We typically do not conduct unannounced audits.

Training

In line with the Home Office guidance, Auditors, HR, Technical and Purchasing managers have all received training on the Modern Slavery and Human Trafficking act and will continue to stay updated of the evolving situation.

Signed



Date

25/1/19

Position

MANAGING DIRECTOR