

1. Introduction

Vernacare International Ltd is committed to complying with all applicable laws in every country where we operate or distribute goods.

We strictly prohibit the use of forced, slave, or child labour, as well as any form of abuse or physical punishment of individuals working for or on behalf of Vernacare.

Prior to entering into any contractual arrangements, we conduct thorough due diligence on prospective suppliers, distributors, contractors, and customers to ensure they meet the minimum legal requirements in their respective jurisdictions and confirm, as far as reasonably possible, that no forced, slave, or child labour is involved.

2. Scope

This policy applies to all individuals and organisations performing work for Vernacare or on our behalf, including contractors, consultants, suppliers, distributors, and any third parties providing services.

Ethical compliance within Vernacare and its supply chain is a core principle of our business operations. We employ trained staff to uphold the Labour Standards Assurance Scheme (LSAS) by the NHS and other ethical standards, which are reviewed at least annually as part of our management review process.

Vernacare currently holds LSAS Level 4 status at its Worksop site—the highest level awarded—and has plans to achieve the same standard across all sites within three years.

All Tier 1 suppliers undergo ethical audits conducted by Vernacare or approved third parties. These audits cover Health & Safety, Employment Law, and compliance with the Ethical Trade Initiative (ETI Base Code), which addresses forced or bonded labour in relation to modern slavery.

Audits are scheduled based on product risk and supplier location. Results are shared with the supply chain, and we work collaboratively to implement improvements and ensure full understanding of ETI requirements.

Under LSAS, all critical suppliers receive Vernacare's Whistleblowing Policy in their native language, enabling anonymous reporting of safety or quality concerns. We actively encourage familiarity with the ETI Base Code and provide guidance in local languages where needed.

For high-risk supply chain areas, we engage local representatives to facilitate direct reporting of issues. This proactive approach strengthens ethical and quality compliance beyond reliance on audits alone.

3. Policy Commitments

- Zero tolerance for modern slavery, human trafficking, forced labour, and child labour.
- Compliance with the UK Modern Slavery Act 2015 and equivalent legislation in all jurisdictions where we operate.
- Continuous monitoring and improvement of ethical standards across our supply chain.
- Provision of training and resources to employees and suppliers to ensure awareness and compliance.

4. Reporting & Whistleblowing

We encourage anyone with concerns related to modern slavery or unethical practices within our operations or supply chain to report these immediately through our Whistleblowing Policy. Reports can be made anonymously and will be investigated promptly and thoroughly.

5. Governance & Review

This policy is reviewed annually as part of Vernacare's management review process and updated as necessary to reflect changes in legislation, business operations, or risk assessments.

Date of Amendment	Reason	Version	By
Aug 2023	Created	V1	HR
Aug 2024	Updated	V2	HR
Nov 2025	Updated	V3	HR

Board Level Signatory

Name:

Role Title:

Signature: *Richard Hall*

Date: