



1. Introduction

Medspace Solutions Ltd (the "Company") is a manufacturer, supplier and installer of clinical medical furniture and other bespoke fabricated furniture such as reception desks. We currently operate solely within the UK, and the policy will be updated as and when this changes.

Medspace Solutions is committed to upholding the highest standards of ethical conduct and ensuring that modern slavery, in all its forms—including slavery, servitude, forced work, and human trafficking—does not exist in our operations or supply chains. We recognise that our business decisions, particularly around purchasing practices, can unintentionally put pressure on suppliers, increasing the risk of exploitative labour practices. This policy outlines the actions we take to prevent modern slavery and promote ethical employment standards across all levels of our supply chain.

2. Purpose

This policy is designed to provide clear guidance on how Medspace Solutions identifies, mitigates, and addresses the risks of modern slavery. It applies to all employees, contractors, suppliers, and business partners globally, and ensures that we remain committed to creating a supply chain free from exploitation, coercion, and unethical employment practices.

3. Legal Compliance

The Company adheres to all relevant local, national, and international laws, including but not limited to:

- The UK Modern Slavery Act 2015
- International Labour Organization (ILO) conventions
- United Nations Guiding Principles on Business and Human Rights
- Local employment / labour laws applicable to the regions in which we operate

4. Workers' Rights & Ethical Labor Practices

Medspace Solutions is committed to safeguarding the fundamental rights of all workers. We strictly prohibit:

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- **Freedom to Terminate Employment:** Workers must be free to terminate their employment at any time, without penalties, by providing reasonable notice in line with local laws.
- **Freedom of Movement:** Workers shall not be confined to their workplace or accommodation, and their freedom of movement must not be restricted.
- **Freedom of Association:** Workers have the right to form and join trade unions or engage in collective bargaining, as permitted by local laws.
- **Threats of Violence, Harassment, and Intimidation:** Any form of violence, harassment, or intimidation is strictly prohibited within our operations and supply chains.
- **Worker-Paid Recruitment Fees:** Workers shall not be charged recruitment fees. All recruitment costs will be covered by the employer.
- **Compulsory Overtime:** No worker shall be forced or coerced into working overtime. Overtime must be voluntary and properly compensated.
- **Child Employment:** The use of child labour is strictly prohibited, and we require all workers to meet the minimum legal working age in their country.
- **Discrimination:** We do not tolerate any form of discrimination based on race, gender, religion, sexual orientation, disability, or any other protected characteristic.

Confiscation of Identification Documents: Workers’ personal identification documents, such as passports, must not be withheld or confiscated under any circumstances.

5. Addressing Purchasing Practices and Their Impact on Modern Slavery

We recognise that certain purchasing practices can unintentionally put pressure on suppliers, potentially leading to exploitative work conditions. To address this, we have identified key purchasing practices that could contribute to modern slavery and outlined how we manage them:

1. **Aggressive Pricing:** Offering prices that do not reflect sustainable production costs can force suppliers to cut corners, often at the expense of employment standards. We ensure that our pricing models support ethical working practices and sustainable production.
2. **Short Lead Times:** Unreasonably short lead times can lead suppliers to overwork their employees or employ unregulated employment. We work closely with suppliers to set realistic deadlines that allow for compliance with employment standards.
3. **Late High-Volume Orders:** Large last-minute orders put pressure on suppliers to exploit labour in order to meet demands. We strive to provide adequate notice for large orders, allowing suppliers time to manage their workforce fairly.
4. **Inaccurate Forecasting:** Poor forecasting can cause volatility in demand, leading to working practice abuses such as excessive overtime. We continuously refine our forecasting processes to reduce fluctuations and ensure predictability for suppliers.

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5. **Late or Extended Payments:** Delayed payments can negatively impact supplier cash flow, often leading to poor working conditions. We are committed to paying suppliers on time and according to agreed terms.
6. **Withdrawing from Contracts Last Minute:** Last-minute cancellations can harm suppliers' financial stability and create pressures that lead to exploitative practices. We will only withdraw from contracts with justifiable notice and consideration for suppliers.
7. **Unfair Penalties for Not Meeting Orders:** Unfair penalties, especially in the case of last-minute changes, can pressure suppliers to exploit workers. We maintain fair and transparent penalty structures that respect suppliers' capacity.
8. **Accuracy of Technical Specifications:** Unclear or inaccurate technical specifications can lead to rushed work and labour exploitation. We ensure that our technical requirements are accurate and clearly communicated to suppliers to avoid any unnecessary pressure.

6. Risk Mitigation in Supply Chain and Purchasing Practices

Medscape Solutions has a supply chain made up of around 50 approved suppliers. All suppliers must complete a questionnaire, and if deemed appropriate a site visit to ensure compliance with quality standards. Within these standards, compliance with the Anti Slavery Act 2015 is an absolute requirement. We are very confident that no organisation within our current supply chain falls below these standards. Medspace Solutions takes the following steps to minimise the risks of modern slavery in our supply chain:

- **Supplier Risk Assessments:** We conduct regular risk assessments and due diligence on suppliers to identify areas where the risk of modern slavery is heightened, such as high-risk geographies or industries.
- **Supplier Audits and Engagement:** Suppliers are expected to comply with our ethical standards. We conduct regular audits and engage with suppliers to ensure that they meet the Company's expectations on employment and working practices and modern slavery prevention.

Sustainable Contracts and Fair Payment Terms: We ensure that all supplier contracts reflect fair and sustainable business practices, including realistic production schedules, transparent pricing models, and timely payments.

7. Access to Remedy, Compensation and Justice

We are committed to providing access to remedy, compensation, and justice for victims of modern slavery found within our supply chain or business operations. We will work with local

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authorities, NGOs, and other partners to ensure that victims receive appropriate support and that those responsible for abuses are held accountable.

8. Reporting and Investigations

Medspace Solutions encourages employees, suppliers, and third parties to report any concerns regarding modern slavery or unethical working practices. Reports can be made confidentially and without fear of retaliation via:

- The Company's whistleblowing email: msreporting@medspacesolutions.co.uk
- The Company's Modern Slavery Reporting form found at the bottom of this page <https://www.medspacesolutions.co.uk/modern-slavery-policy/>
- Direct reporting to management or the Human Resources department.

All reports will be thoroughly investigated, and appropriate actions, including collaboration with local authorities, will be taken as necessary.

9. Training and Awareness

To prevent modern slavery, we provide regular training to employees, procurement teams, and management on the risks associated with modern slavery and how our purchasing practices can influence employment and working conditions in the supply chain. Suppliers are also informed of our standards and expectations.

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business our Modern Slavery Policy is included in our Employee Handbook.

We provide training to all members of staff and this has been incorporated into our induction programme.

10. Continuous Improvement

We are committed to continuously improving our practices in combating modern slavery. This includes regular reviews of our purchasing practices, supplier relationships, and the overall effectiveness of this policy to ensure ongoing compliance with the latest legal and ethical standards.

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11. Compliance and Disciplinary Action

Any violation of this policy by employees, contractors, or suppliers will be addressed through disciplinary action, which may include contract termination, legal action, or reporting to relevant authorities. Non-compliance will not be tolerated.

12. Review and Approval

This policy will be reviewed annually and updated as necessary to reflect any changes in legislation, business operations, or supply chain activities. It will be approved by the Company's Board of Directors, and any significant changes will be communicated to all employees, suppliers, and relevant stakeholders.

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Authored By::	Steve Caira
Approved By:	
Date Approved:	14-03-25
Next Review Date:	15-03-26
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