

# **Modern Slavery Policy**

## **Valley Northern Ltd**

### **Introduction**

This policy applies to Valley Northern Limited (the "Organisation") and outlines our commitment to preventing modern slavery and human trafficking in our operations and supply chains. This policy is in accordance with the Modern Slavery Act 2015 and reflects updates and best practices as of 2025.

### **Organisational Structure**

Valley Northern Limited is a limited company headquartered in Stafford in the Midlands, UK.

We specialise in the wholesale of medical packaging products, medical furniture, dispensers, and disposables.

Our operations include sales via website, telephone, email, post, and fax.

Our supply chains include suppliers from the UK, Europe, and globally.

### **Definitions**

Modern slavery encompasses:

Human trafficking

Forced labour through mental or physical threat

Control by an employer through abuse or threat of abuse

Dehumanisation, treating individuals as commodities

Restriction of freedom of movement

### **Commitment**

Valley Northern Limited is committed to:

- ✓ Complying with the Modern Slavery Act 2015
- ✓ Conducting ongoing reviews of our internal practices and supply chains
- ✓ Not engaging with organisations involved in slavery or human trafficking
- ✓ Adhering to and exceeding relevant UK employment legislation standards

## **Policies in Relation to Slavery and Human Trafficking**

We have a zero-tolerance policy towards modern slavery and human trafficking. This policy is communicated to all suppliers, contractors, and business partners at the outset of our business relationship and reinforced as appropriate thereafter.

Our terms and conditions of supply include a clause to this effect.

## **Due Diligence Processes**

We conduct regular risk assessments and due diligence processes to identify and mitigate risks of modern slavery in our operations and supply chains. This includes:

- ✓ Reviewing supplier terms and conditions to include clauses for the disallowance of involvement in modern slavery
- ✓ Implementing measures to identify and assess risks
- ✓ Conducting impact assessments and creating action plans

## **Risk Assessment and Management**

We identify parts of our business and supply chains where there is a risk of modern slavery and human trafficking. We take the following steps to assess and manage that risk:

- ✓ Avoid sourcing from high-risk countries like China
- ✓ Regularly review and monitor our supply chains
- ✓ Engage with suppliers to ensure compliance with our policies

## **Effectiveness and Performance Indicators**

We measure our effectiveness in ensuring that modern slavery and human trafficking are not taking place in our business or supply chains through:

- ✓ Keeping records of any known cases
- ✓ Regular audits and reviews of our practices and supply chains
- ✓ Monitoring and reporting on key performance indicators

## **Training and Capacity Building**

We provide training to all staff on our modern slavery policy, including our recruitment and equality policies. Our core values, including 'Kind and True,' are emphasised in

meetings and displayed prominently in our offices and materials. Training and capacity building about slavery and human trafficking are available to all staff to ensure they understand and can effectively implement our policy.

### **Reporting and Compliance**

We have a designated Slavery Compliance Officer to address concerns and ensure compliance with our obligations. Employees can raise concerns through our grievance procedure, and all reports are logged and reviewed by management.

### **Impact of COVID-19**

During the COVID-19 pandemic, we maintained our modern slavery monitoring procedures and ensured that employees had access to support and grievance mechanisms.

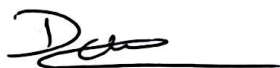
### **Review and Approval**

This policy is reviewed and approved by the Managing Director. It reflects our ongoing commitment to combating modern slavery and human trafficking.

---

Date of Approval: February 2025

Signed:



Print: DALE PITTOCK

Position: Managing Director

---