

## Modern Slavery Act 2015: Slavery and Human Trafficking Statement – IDH Group

### INTRODUCTION

We are committed to improving our practices to combat slavery and human trafficking and to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have zero tolerance to slavery and human trafficking.

This statement sets out our actions to understand the potential modern slavery risks related to the business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in the business and its supply chains.

### ORGANISATIONAL STRUCTURE

We are the UK's number one vertically integrated dental chain with over 670 dental practices nationwide and we supply dental products and services to dental practices throughout the UK. Our ultimate parent company is Turnstone Equity Co 1 Limited which has its head office in England. We have over 6800 employees and operate in England, Scotland, Wales and Northern Ireland.

### RELEVANT POLICIES

The organisation operates the following policies which set out our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Anti-slavery Policy** - We have introduced an Anti-slavery and Human Trafficking Policy which 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.

**Whistleblowing policy** - We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

**Employee code of conduct/ Code of Ethics** - The organisation makes clear to employees the actions and behaviour expected of them when representing the

organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we have in place processes to:

- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.

We are also reviewing ways in which to manage suppliers that fail to improve their performance, seriously violate our Anti-Slavery and Human Trafficking Policy or breach anti-slavery and human trafficking laws, including the termination of the business relationship.

### **TRAINING AND AWARENESS**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to all relevant staff.

As well as training staff, the organisation will raise awareness of modern slavery issues and in particular:

- the basic principles of the Modern Slavery Act 2015;
- how employees can identify and prevent slavery and human trafficking; and
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.

### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We use the following indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- requiring all relevant staff to have completed training on modern slavery;
- ensuring all relevant staff are made aware of the basic principles of the Modern Slavery Act 2015 and know how to flag any concerns to the business;

In addition, the business is:

- developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains and, where necessary, contact suppliers to ensure that they agree to comply with the requirements of the Act and the Group's policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2016.



Terry Scicluna,

Chief Executive Officer, mydentist

Date: Thursday, 18<sup>th</sup> August, 2016