



MODERN SLAVERY POLICY STATEMENT

This Modern Slavery and Human Trafficking Statement issued under Section 54 of the UK Modern Slavery Act 2015 covers Pioneer Wound Healing & Lymphoedema Centres (Pioneer) for the financial year ending 2021.

Pioneer, recognising that modern slavery is an international crime, is committed to acting ethically and with integrity in all our business dealings and relationships, with zero tolerance for modern slavery, servitude, forced labour, human trafficking of any kind, human rights violations, and child labour. Pioneer and all staff working for the company are committed to ensuring our business is transparent, as such we will comply with the disclosure obligations under the Modern Slavery Act 2015.

We will implement and enforce effective systems and controls to ensure Modern Slavery is not taking place within our own business and supply chains.

Pioneer expects all our contractors, suppliers and other business partners to uphold high standards in all business practices. Our due diligence processes seeks confirmation from the supplier that they are compliant with the Modern Slavery Act 2015 (where that supplier has an annual turnover in excess of £36 million).

As part of our initiative to identify and mitigate risk, Pioneer is in contact with relevant suppliers and contractors to ensure they comply with the Modern Slavery Act 2015. We ensure that we work with suppliers who treat their obligations towards modern slavery with the same importance that we do.

Pioneer has put in place procedures designed to:

- Identify and assess potential risk areas to our business and supply chain
- Mitigate the risk of slavery and trafficking occurring in our business and supply chain
- Monitor potential risk areas in our business and supply chain
- Provide adequate protection for whistle blowers

This policy applies to all persons working for, or on behalf of Pioneer, in any capacity. This includes but does not limit the policy applicability to: employees, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives and business partners.