



Reference No.:
Title:
Status:
Effective Date:
Version:

POL-007
Modern Slavery and Human Trafficking Policy
Published
See Document Record
1

Page 1 of 2

In accordance with the Modern Slavery Act 2015, MatOrtho Limited is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively "human trafficking and slavery"). It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

Accordingly, MatOrtho Ltd will not knowingly use unlawful child labour or forced labour in any of the services it provides, nor will it accept commodities, products and/or services from suppliers that employ or utilise child labour or forced labour.

It is company practice to seek the successful candidate's consent to seek two written references and to ask for documentary proof of qualifications and the right to work in the case of any successful candidate.

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This Policy statement thus defines MatOrtho's commitment to ensuring that human trafficking and slavery does not exist within its own business but also provides how MatOrtho will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship (and especially from within its supply chain).

Definitions

Human Trafficking: The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labour: All work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful Child Labour: Consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

Requirements for Suppliers

All Suppliers are therefore required to adhere to the following:

Every Supplier of Products or Services to MatOrtho:

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
- Will ensure that the overall terms of employment are voluntary;
- Will comply with the minimum age requirements prescribed by applicable laws;
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
- Will abide by applicable law concerning the maximum hours of daily labour;
- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK, and;
- Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to MatOrtho, also adhere to these requirements.

Suppliers will on request certify compliance with this Policy and their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.



Reference No.: **POL-007**
Title: **Modern Slavery and Human Trafficking Policy**
Status: **Published**
Effective Date: **See Document Record**
Version: **1**

Page 2 of 2

Upon request, Suppliers must be able to demonstrate compliance with this Policy to the reasonable satisfaction of MatOrtho. MatOrtho may perform periodic audits on this Policy and Suppliers are expected to fully co-operate with any such audit.

Reporting

Any breach of this Policy (including by a Supplier) can be reported (in confidence, if required) by contacting MatOrtho's Head of QA&RA (in his capacity as MatOrtho's Anti-Slavery and Human Trafficking Officer).

Consequences

MatOrtho takes any breach of this Policy extremely seriously.

Suppliers who are found to have or be engaging in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract with MatOrtho terminated immediately, without compensation.

If a Supplier to MatOrtho is found in violation of this policy, MatOrtho will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier (as above). It shall also take such other (remedial) steps as the Anti-Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

Approvals

Approver	Signature
John Tullett	See Electronic Signature in Greenlight Guru Document Record.
Oriol Millet-Lopez	See Electronic Signature in Greenlight Guru Document Record.
Claire Padbury	See Electronic Signature in Greenlight Guru Document Record.

POL-007 (DOC-15) Ver. 1

Approved By:
[\(CO-295\) POL-007 Update](#)

Description
Update Policy POL-007 to transition to revised template, implement minor formatting changes, clarify statement regarding right to work to paragraph 3, remove section on recruitment policy, update contact for MatOrtho’s Anti-Slavery and Human Trafficking Officer from Operations Director to Head of QA&RA.

Justification
Clarification of statement relating to checks on eligibility to work following Action 8 raised in MMR-26-02. Recruitment policy not directly relevant to this Policy and is a repeat of the existing recruitment policy.

Assigned To:	Initiated By:	Priority:	Impact:
Yasin Noormohamed	Yasin Noormohamed	Low	Minor

Version History:

Author	Effective Date	CO#	Ver.	Status
Yasin Noormohamed	September 16, 2026 8:09 AM BST	CO-295	1	Published
Alex Chalasova	August 4, 2025 4:06 PM BST	CO-1	0	Superseded