



## **COMPANY POLICIES & PROCEDURES No. 41**

### **Modern Slavery Policy**

**Version 4.0**

**Created: November 2020**

**Last Reviewed: January 2026**

**Next review: January 2028**

| <b>Date</b>    | <b>Document Version</b> | <b>Document Revision History</b> | <b>Document Author/Reviser</b> | <b>Policy Approved by</b> |
|----------------|-------------------------|----------------------------------|--------------------------------|---------------------------|
| November 2020  | 1.0                     | Policy Creation                  | Adam Fisher                    | Caroline Packer           |
| September 2022 | 2.0                     | Policy Review                    | Kathryn Martin                 | Adam Fisher               |
| January 2024   | 3.0                     | Policy Review                    | Adam Fisher                    | Caroline Packer           |
| January 2026   | 4.0                     | Policy Review                    | Adam Fisher                    | Caroline Packer           |

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## **1. Policy Statement**

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, forced labour and human trafficking, all of which have in common the deprivation of a person's freedom by another in order to exploit them for personal or commercial gains.
- 1.2 DMR Collation falls below the Modern Slavery Act turnover threshold; however, we recognise that there will be significant expectations when working alongside larger firms as part of their supply chain.
- 1.3 DMR Collation has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in its business dealings and relationships by carrying out due diligence to ensure modern slavery is not taking place within its own business operations or that of its suppliers.

## **2. Due Diligence Processes**

- 2.1 DMR Collation is committed to ensuring there is transparency in its own business to tackling modern slavery; we regularly review our salary grades and associated working hours to ensure that we adhere to the UK living wage / national minimum wage requirements, minimum labour standards and safe working conditions for all our employees. We utilise pre-employment checks and do not operate a global workforce.
- 2.2 DMR Collation expects the same high standards from its suppliers, contractors, and other business partners. Therefore, as part of its procurement process it asks suppliers bi-annually to complete a Supplier Questionnaire which gives evidence of their approach and policies related to a number of areas enforced by the Modern Slavery Act.
- 2.3 DMR Collation has codes of conduct in place for its suppliers as detailed in the Outsourced Activities section of the Information Management and Security Handbook.

## **3. Policy Purpose**

- 3.1 The purpose of this policy is to set out how DMR Collation adheres to its obligations under the Modern Slavery Act 2015.

## **4. Scope**

- 4.1 This policy applies to all persons working for DMR Collation or on its behalf in any capacity including employees at all levels, directors, contractors,

external consultants (Medical Analysts) and suppliers forming part of their supply chain.

## **5. Responsibilities**

- 5.1 The Managing Director has overall responsibility for ensuring effective implementation of this policy.
- 5.2 Day to day responsibility is delegated to the Office Manager.

## **6. Embedding the principles**

- 6.1 DMR Collation will continue to embed the principles of the Modern Slavery Act 2015 by informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.

## **7. Breaches of this Policy**

- 7.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal or gross misconduct.
- 7.2 The Company may terminate its relationship with any contractors, suppliers or external consultants working on its behalf if they breach this policy.

## **8. Our policies in relation to the Modern Slavery Act 2015**

- 8.1 This Policy should be read in conjunction with the:
  - 7.1.1 Supplier Questionnaire.
  - 7.1.2 Outsourced Activities section of the Information Management and Security Handbook.
  - 7.1.3 Personnel Handbook.
  - 7.1.4 Corporate Social Responsibility Policy.
- 8.2 A copy of this policy is available for public view on our company website.