

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 July 2024.

TGQ Medical ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational Structure

TGQ Medical and has business operations in the United Kingdom.

We operate in the Health Care sector. The nature of our supply chains is as follows: We work with a number of key direct suppliers, who provide us with goods, such as equipment for our premises, and services, such as outsourced business processes, IT software and marketing services. Our Procurement process has been reviewed to ensure that human trafficking and modern slavery issues are considered at an early stage, reducing self-certification from potential suppliers that their supply chains comply with the law. We operate professional practices relating to procurement and supply and ensure procurement staff attend regular training on changes to procurement legislation.

For more information about the Company, please visit our website: www.tgqmedical.com .

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- Recruitment and selection policy - All staff receive a comprehensive induction programme which includes information on, and guidance regarding, slavery and human trafficking. All staff are required, as part of mandatory training, to complete safeguarding courses, which cover obligations under the Act. We also require external agencies supplying temporary staff to demonstrate compliance with the legislation. All clinical and non-clinical staff have a responsibility to consider issues regarding modern slavery and incorporate their understanding of these into their day-to-day practices.

All colleagues have a personal responsibility for the successful prevention of slavery and human trafficking with the procurement department taking responsibility for overall compliance.

A quarterly Integrated Learning Report is submitted to the Board of Directors which includes an overview of the number of concerns raised by staff and the category that they fall into.

- Supplier code of conduct - With regard to national or international supply chains, our point of contact is always preferably with UK entities, and we expect these to comply with legislation and have suitable anti-slavery and human trafficking policies and processes in place.
- Whistleblowing policy - Please see relevant policy

- Staff code of conduct - Please see relevant policy
- Procurement policy - Please see relevant policy
- Safeguarding policy - We update relevant policies on a regular basis to highlight obligations where any issues of modern slavery or human trafficking might arise, particularly in our procedures for safeguarding adults and children and young people, tendering for goods and services, and recruitment and retention.

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.
- External supplier audits.
- Checking certain suppliers with external third parties for any slavery or human trafficking risks.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

Risk and Compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Creating an annual risk profile for key suppliers.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because The majority of our supply chain is based in the UK and and we expect these to comply with UK legislation and have suitable anti-slavery and human trafficking policies and processes in place..

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 4 months.
- We will train our staff about modern slavery issues and increase awareness within the Company.
- We will carry out a regular audit of suppliers - 100% of suppliers each year.

Training Staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

Next Steps

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by:

- 3. Key signs of Modern Slavery and Human Trafficking
Physical
 - Injuries apparently as a result of assault or controlling measures
 - Neurological symptoms, headaches, memory loss, dizzy spells
 - Gastrointestinal symptoms
 - Cardiovascular symptoms
 - Musculoskeletal symptoms
 - Tattoos or other marks indicating ownership by exploiters
 - Work related injuries, often through inadequate personal protective equipment or poor health and safety measures.

Sexual

- Sexually transmitted infections
- Injuries of a sexual nature
- Gynaecological symptoms such as urinary or vaginal infections, pelvic inflammation
- Pregnancy as a result of their modern slavery situation, or they may have recently been forced to terminate a pregnancy.

Psychological

- Expression of fear or anxiety
- Depression or isolation
- Suffering from post-traumatic stress and or a range of other trauma induced mental or physical illnesses
- An attitude of self-blame, shame and an extensive loss of control
- Withdrawn and submissive
- Drug or alcohol use
- Self-harm
- Suicidal ideations.

Pregnancy

- Late booking
- Frequent non-attendance at appointments
- Poor preparation for impending birth
- Frequent calls to helpline
- Frequent attendances to out of hours services and triage
- Presenting with non-specific symptoms
- Reluctance to seek help
- Poor or no antenatal care

- Few personal effects.

Situational and environmental indicators

- Frequently moves locations, boroughs, counties, or countries
- Fearful or emotional about their family or dependants
- Lack of knowledge about the area they live in the UK
- Passport or travel document has been confiscated
- Fear of saying what their immigration status is
- Limited English, e.g., having vocabulary relating only to their exploitative situation
- Acting as if instructed by another
- Someone is taking advantage of their illegal status in the UK
- Distrust of authorities.

General Signs

- No passports
- No information about rights as a UK worker
- No information about their rights as a visitor in the UK
- Vague and inconsistent history
- Always accompanied by someone who may appear controlling
- Person with them does all the talking
- Never left alone
- Unsure of own medical history
- Not registered with a GP, nursery or school
- Appearance suggest neglect, note, someone working in prostitution may look well kept.

What to do if you spot the signs

If you suspect that a person is a victim of slavery or trafficking, this is a safeguarding issue.

You should trust and act on your professional instinct that something is not quite right. It is usually a combination of triggers, an inconsistent story and a pattern of symptoms that may cause you to suspect trafficking.

If you have any concerns about a child, young person or adult take immediate action to ask further questions and get additional information and support. It is important to remember that:

- trafficked people may not self-identify as victims of modern slavery
- trafficking victims can be prevented from revealing their experience to health care staff from fear, shame, language barriers and a lack of opportunity to do so. It can take time for a person to feel safe enough to open up
- err on the side of caution regarding age. If a person tells you they are under 18 or if a person says they are an adult, but you suspect they are not, then take action as though they were under 18 years old
- support for victims of human trafficking is available.

Action to take

- Take immediate action for those considered to be in immediate danger
- Follow local safeguarding referral processes
- Raise concerns with safeguarding lead
- Ensure a clear and accurate record of the concern is made and actions taken.

4. Policy

Commitments

We are a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery and human trafficking:

- We have a zero-tolerance approach to modern slavery and human trafficking in our organisation and our supply chains.

- The prevention, detection and reporting of modern slavery and human trafficking in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Colleagues must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery and human trafficking in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and human trafficking.
- Consistent with our risk-based approach we may require:
 1. Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct.
 2. Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationship.

The statement was approved by the board of directors.



Rebecca Olowookere, Director
TGQ Medical

02/01/2025

Date