

## Company Disclosure under UK the Modern Slavery Act 2015

### SLAVERY AND HUMAN TRAFFICKING STATEMENT – 1 APRIL 2020

This statement has been published in accordance with the Modern Slavery Act 2015. Our statement demonstrates our measures and methodology to preventing Modern Slavery and Human Trafficking throughout our business and supply chain.

KeyMed (Medical and Industrial Equipment) Limited ("Olympus KeyMed) recognises that slavery and human trafficking can occur in many forms, such as forced labour, domestic servitude, sex trafficking, and workplace abuse. These actions are an abhorrent criminal activity which is not isolated to individual business areas or countries. It is a global issue which affects all sectors with over 40 million people subjected to modern slavery and over 24.9 million subjected to forced labour<sup>1</sup>.

Olympus KeyMed is committed to maintaining and improving its systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain, and our products.

#### Our Company

Olympus KeyMed is one of the UK's leading manufacturers of optical products employing over 1000 individuals. We provide an extensive range of products for use in a variety of different sectors. Our overall aim is to continue to produce sophisticated and effective products for use in the medical, industrial and consumer sectors.

As a market leader in the medical device industry, we are devoted to supporting the NHS and private institutions throughout the UK. It is critical to Olympus KeyMed that we continuously develop and improve upon our products and consistently provide medical devices which have a positive effect to patient care.

#### Organisation and Supply Chain Structure

Olympus KeyMed has over 1400 suppliers who provide fundamental support to our organisation.

A significant amount of our suppliers originate from the UK and are all subjected to a stringent procurement and due diligence processes, prior to being contracted by our company. Any indication or tolerance towards activities in contrary to the Modern Slavery Act 2015 will result in a re-evaluation by Olympus KeyMed which can result in a termination of the relationship.

#### Due Diligence and Third Party Management

As a company, we firmly believe that by understanding and acknowledging our customers and suppliers past and present activities, we put ourselves in a greater position to actively avoid engaging with third parties whose actions breach of human rights.

We conduct thorough due diligence checks on all of our customers and third parties before the commencement of any business relationship. Our Legal and Compliance Department will conduct an initial screening of all third parties and gather an extensive timeline of any activity in contrary to domestic or international legislation.

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<sup>1</sup> <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm>

A higher level of scrutiny is applied to businesses operating within countries with a history of non-compliant activities and export control sanctions. Alongside this, we monitor and understand the possibility of non-compliance through resale with the following categories of third parties always subject to higher levels of due diligence investigations:



We continue to improve upon our existing rules and controls by performing routine internal monitoring and audits of all of our third parties with additional cross regional oversight.

## Policies and Code of Conduct – Slavery and Human Trafficking

Our commitment to human rights is outlined by our own principles documented in the Olympus Code of Ethics and Business Conduct which is aligned to the United Nations Global Compact's 10 Principles related to human rights, labour, environment and anti-corruption.

The Olympus Code of Ethics and Business Conduct is a central reference point for all Olympus KeyMed employees to enable them to understand what behaviour is ethical, legal and responsible. It builds together our corporate core values, national and international laws, internal policies, voluntary commitments and ethical principles.

We follow our parent company policies for Human Rights and Labour and Procurement. These policies are based on the company management philosophy. In addition to disseminating information about our basic stance on procurement within and beyond the Olympus Group, we are continuously working to ensure compliance with legislation, regulations and social norms.

For suppliers, we set our expectations in areas such as respect for human rights, compliance with legislation, regulations and social norms, including the law concerning the exclusion of antisocial elements, the prohibition of corruption, bribery and similar behaviour, the promotion of fair and equitable trading, and consideration for the environment.



### **Tackling Modern Slavery – Measures in Place**

Olympus KeyMed has utilised the services of an independent company to provide all employees, business partners and other parties an avenue to report violations of our Code of Ethics and Business Conduct, The EthicLine.

The EthicsLine is available 24 hours a day, 365 days year with all reports kept strictly confidential and all calls untraceable. Personal information relating to the report will not be shared outside of Olympus without the explicit consent of the reporting individual.

Every reportable instance is thoroughly investigated by Olympus KeyMed. This reporting route is highlighted to all employees during mandatory training sessions conducted by the Legal and Compliance Department.

### **Modern Slavery Training**

Olympus KeyMed provides mandatory internal awareness training for all employees on compliance topics, including Modern Slavery. In addition to this internal training, all employees are also required to complete Electronic Learning courses on our Code of Ethics and Business Conduct.

Employees with greater exposure to our supply chain are provided with targeted training focussed on indications and identification of Modern Slavery. All awareness training must be renewed on an annual and bi-annual basis depending on the individual departments risk exposure.

We also monitor feedback provided by our colleagues on our awareness training and are continuously evolving our training program. We aim to provide further resources for employees including targeting training for key employees and additional E-Learning and podcast training materials for all employees.

Financial Year	Number of UK Employees Trained
2018/2019	188
2017/2018	285
2016/2017	156

If you become aware of any credible information linking Olympus to slavery and human trafficking, please report this information to Olympus at the e-mail address below:

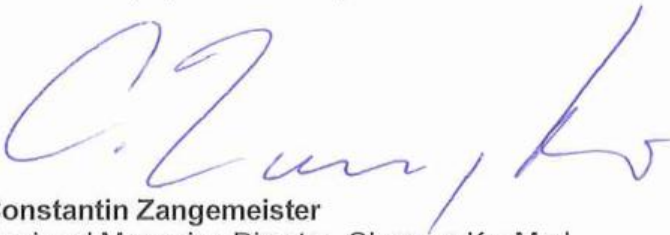
[corporate.compliance@olympus.co.uk](mailto:corporate.compliance@olympus.co.uk)

Alternatively, you can report through our Ethics Line service by any of the methods below;

Telephone: 0800 890011

E-mail: [www.olympus.ethicspoint.com](http://www.olympus.ethicspoint.com)

The statement described above was adopted and approved by the Board of KeyMed (Medical and Industrial Equipment Limited) on 26 March 2019.



**Constantin Zangemeister**  
Regional Managing Director, Olympus KeyMed

On behalf of the Board of Directors