

## Modern Slavery and Human Trafficking Statement

### Introduction

The Modern Slavery Act came into effect in October 2015 and requires businesses in the UK (having annual turnover of £36 million or more) to disclose information regarding the steps they have taken to eradicate slavery and human trafficking from their business and supply chain.

Cuttlefish Limited is committed to acting ethically and with integrity and although our turnover is below the £36 million threshold, we have taken steps to ensure that modern slavery is not taking place anywhere in our organisation or within our wider supply chain and are committed to producing a Modern Slavery Statement annually.

This statement refers to the financial year ending 31 March 2024 and sets out the steps we have taken to address modern slavery risks in our business and supply chains.

### Organisation structure and supply chains

Cuttlefish Limited is a supplier of pharmaceutical, medical devices, food supplements and cosmetic products. Based in West Sussex in the United Kingdom, Cuttlefish procures and distributes products that have been sourced from carefully selected partner sites. We buy from wholesalers as well as directly from manufacturers.

### Policies in relation to slavery and human trafficking

We have a Modern Slavery and Labour Standards Assurance System Policy

- 1. Employment is freely chosen**
- 2. Freedom of association and the right to collective bargaining are respected**
- 3. Working conditions are safe and hygienic**
- 4. Child labour shall not be used**
- 5. Living wages are paid**
- 6. Working hours are not excessive**
- 7. No discrimination is practiced**
- 8. Regular employment is provided**
- 9. No harsh or inhumane treatment is allowed**

The policy is derived from the Ethical Trading Initiative (ETI) Base Code, which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

We are committed to implementing this policy and will seek assurances from our suppliers that the policy standards are being met.

### Due diligence processes

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

We operate a Modern Slavery and Labour Standards Assurance System process to ensure that we are conducting business in an ethical manner. This procedure involves a process to be followed in assessing our suppliers and quantifying risk.

## **Risk assessment and management**

During the course of the current financial year we have begun to conduct risk assessments of our first tier suppliers.

We believe that the risk of modern slavery in our directly employed workforce and first tier UK suppliers is low but we will continue to monitor the response from our suppliers to the risk assessment process. Our exposure to the risk of modern slavery may increase when first tier suppliers are outside of the UK or EU and when we consider second and third tier suppliers.

## **Key performance indicators to measure effectiveness of steps being taken**

We have not discovered any incidences of modern slavery or human trafficking in our organization or first tier suppliers.


Our risk assessment process is ongoing and we will continue to monitor suppliers in the 2024/2025 financial year and we will review annually.

We will continue to develop and improve our approach to respecting human rights and preventing modern slavery. We will do this by learning from the experiences of our business and suppliers as they address modern slavery risks. In 2024/2025, we plan on conducting more due diligence, including risk assessment of more second tier suppliers.

## **Training on modern slavery and human trafficking**

Training is available to all staff involved in the modern slavery and labour standards assurance system and supplier risk assessment. Our Modern Slavery and Labour Standards Assurance System policy is communicated to all employees.

This statement was approved by:



Graeme Parkinson  
Managing Director  
Cuttlefish Limited