

THE ORTHODONTIC COMPANY'S MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

May 2017

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved through its own operations and its supply chain.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps **TOC** has taken and steps we are making to ensure that our business, as well as our supply chains, are free from slavery and human trafficking. As a major provider of specialist orthodontic materials to the orthodontic profession across the UK and Eire; **TOC** has identified that it has a responsibility to take a hardline approach to modern slavery and human trafficking. We recognise that we all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

OUR BUSINESS

TOC was founded in 1992. We supply specialist products to orthodontic and dental professionals throughout the UK and have recently started an export operation. **TOC** purchases from one major global supplier and numerous other companies and offers a comprehensive range of own label products. We currently operate with suppliers in the following regions: United Kingdom, North America, Europe and Asia.

OUR SUPPLY CHAIN RELATIONSHIPS

TOC's supply chain consists of one major American corporate vendor and a number of other vendors throughout the world. We endeavor to establish a relationship of trust and integrity with all our suppliers, and within all our business activities and relationships to minimise the risk of modern slavery. We expect all our suppliers to respect the law and comply with health, safety and environmental standards.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

TOC is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to implementing and enforcing effective systems and controls. We are continuously reviewing our processes to understand what further steps can be taken to ensure that our obligations under the Act are met and that our Anti-Slavery Policy is implemented and complied with.

DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY:

In order to monitor and mitigate the risk of slavery occurring within our supply chain we aim to follow the due diligence processes in relation to our suppliers. We review our purchasing policy on a continuous basis to ensure that there is no slavery or human trafficking in our vendor supply chains.

- We are taking the following steps to ensure that our obligations under the Act are passed through our supply chains:
- We will monitor and review these policies on an annual basis. In order to monitor and mitigate the risk of slavery occurring within our supply chain we adhere to the following due diligence procedures in relation to our suppliers.
- Obtain contractual warranties that no slavery is used anywhere in our suppliers' business or by any of the suppliers in their supply chain and that all necessary processes and policies have been put into place to ensure that this remains the case.
- Where possible we will build long standing relationships with suppliers to encourage understanding and openness with regard to these issues.
- All our suppliers are expected to comply with local and national laws and regulations. Should suppliers fail to comply with our policy we will not engage them as a vendor.
- To have in place systems to encourage the reporting of any concerns related to this subject.

SUPPLIER ADHERENCE TO OUR POLICIES

As part of this approach we will adopt a zero tolerance to any supplier who does not comply with the policies set out in 'The Modern Slavery and Human Trafficking Act'. We are currently not aware of any allegations of human trafficking/slavery activities against any of our suppliers. If any come to our attention we will act immediately to remove the supplier from our vendor list. We will continue to assess and ensure that this remains the case. **TOC's** Operations Manager is responsible for compliance and for communicating to the respective departments and managers who deal with suppliers.

STAFF TRAINING

We will provide training to relevant members of staff to ensure that they understand the risks of modern slavery infiltrating our business or supply chains, this will include the following: How employees can identify the signs of slavery and human trafficking. Various forms of modern slavery in which people can be held and exploited. What external help is available for the victims of slavery. How employees should respond if they suspect slavery or human trafficking. Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.

This statement relates to our current actions and activities and plans underway for 2017.

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