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Modern Slavery Statement

1. Introduction

Modern slavery is the illegal exploitation of people for personal or commercial gain. It takes various forms, such as slavery, servitude, forced and compulsory labour, debt bondage and human trafficking, often in horrendous conditions from which the victim cannot escape. All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation. OneTwo Medical have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a Slavery and Human Trafficking statement each year.

2. Statement

We do not have an annual turnover above £36m, so therefore are not required under this legislation to produce a yearly statement. However, we choose to voluntarily produce a statement>

The Modern Slavery Act specifically states that any statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business'

We cannot guarantee that the entire supply chain is slavery free, and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate those.

3. Organisational Information

OneTwo Medical is a UK-based small and medium-sized enterprise (SME) specialising in the distribution of medical devices to healthcare providers across the United Kingdom. The company operates within the regulated healthcare sector, supplying a range of innovative and clinically effective products to hospitals, clinics and healthcare professionals.

As a distributor rather than a manufacturer, OneTwo Medical does not directly produce goods but works closely with its supply chain partners to ensure that all products meet relevant regulatory and



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ethical standards. This includes maintaining oversight of supplier practices and ensuring alignment with UK expectations on labour standards and responsible sourcing.

4. Our Supply Chain and Procurement

OneTwo Medical operates a focused and manageable supply chain consisting of ten tier one suppliers. This relatively small supplier base enables the organisation to maintain clear oversight of procurement activities and supplier relationships. This enables a transparent approach to procurement and provides a strong foundation for maintaining visibility of risk

OneTwo Medical are committed to ensuring transparency in our own business and our supply chains and expect the same due diligence and commitment from our suppliers, contractors and business partners.

When procuring goods or services we have processes in place to consider Modern Slavery risks. We ensure we carry out supplier due diligence.

This includes:

- Robust supplier selection and policies
- Mapping of the supply chain to identify geographical areas of higher risk

5. Areas of risk identified within the business and supply chain

Supplier risk assessment:

- The risk level is determined using the scale according to the global slavery index. <https://www.globallslaveryindex.org>
- This is cross referenced with the list of goods from the US department of Labour that have been identified to be at higher risk of being produced by child or forced labour. <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>
- Then the sector is checked against the ILO's [Global Estimates of Modern Slavery](#)

Assessment Criteria:

- 0 or 1 Risk factors – Low Risk
- 2 Risk factors – Medium Risk
- 3 Risk factors – High Risk

Tier 1

The nature of the organisational structure means that the overall risk within the business and supply chain for Tier 1 is identified as Low.



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The majority of suppliers are based in low-risk jurisdictions, primarily the United States and Europe, where there are established regulatory frameworks and stronger labour protections. One supplier is based in China, which is recognised as a higher risk geography in the context of modern slavery.

We have suppliers who are in manufacturing and logistics, which are categorised as heightened risk by sector classification and 1 supplier as medium risk due to geographical location and product type, so further due diligence will be undertaken here.

This risk level will be reviewed yearly and reported on.

Tier 2

Tier Two supplies have not been mapped and this represents an opportunity for improvement moving forward.

6. Policies and Processes relating to Modern Slavery

The following policies support our approach to monitoring and mitigating modern slavery within our supply chain:

- Ethical Trading, Human Rights and Labour Standards Policy
- Supplier Code of Conduct
- Whistleblowing
- Anti Bribery

KPIs

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been.

Below are the key performance areas that we assess:

- Governance & due diligence
- Procurement & supply chain
- HR practices, training & education

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

- The number of modern slavery cases identified and remediated
- Update of the Modern Slavery Statement and completion of the MSAT yearly
- Annual modern slavery risk assessment of suppliers conducted
- Policies shared with all employees on Modern Slavery

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement. This will be captured and logged within our Management Reviews.



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7. Training of employees around Modern Slavery

Training on Modern Slavery is provided through policy updates to all employees, which is currently proportionate to our operations.

8. Reporting

If a case of Modern Slavery is suspected, then the following is advised.

A suspected victim of modern slavery is not to be confronted directly as this may endanger them.

If an immediate risk to life, then call the local emergency number (e.g. 911 in the US, 112 in Europe, 999 in the UK), then contact the national helpline or report it online.

Helplines and On-line Reporting

Country	Helpline	Phone	On-line
EU	Anti-trafficking hotline	See https://help.unhcr.org/hungary/wp-content/uploads/sites/86/2022/04/trafficking-hotlines.pdf	
UK	Modern Slavery Helpline	08000 232 700	https://www.modernslaveryhelpline.org/report
US	National Human Trafficking Hotline	1-888-373-7888	https://humantraffickinghotline.org/en/report-trafficking

Employees are required to take their suspicions to their line manager.

If there are concerns around modern slavery with any of our suppliers, we will first look to work with them to remedy the situation with an improvement action plan implemented and more rigorous auditing of the organisation.

If the response from any of our suppliers, here in the UK or abroad, seems inadequate and appropriate measures are not put in place to address coercion, threat, abuse, and exploitation of workers, then we would look to give that company more support, guidance and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies.

If modern slavery is identified or suspected, and resolution is not possible with the supplier, then we will engage with local Non-Governmental Organisations, industry bodies, trade unions or other support organisations to attempt to remedy the situation. If warranted, we will contact local government and law enforcement bodies. Our approach will always consider the safest outcome for the potential victims while also remember the economic influence and control which the organisation holds over those who may be committing these crimes.



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9. Breaches

Any employee who breaches our policies related to this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any suppliers, individuals or organisations working with us, or on our behalf who breach our policies related to this statement may have their relationship or contract with us terminated.

10. Responsibility

The Managing Director, Thanuj Thevar, has overall responsibility for this policy.

11. Review and Communication

This statement will be reviewed by senior management, signed by a director or equivalent and then published on our website.

Internally it will be sent to all employees and sent to our supply chain and other interested stakeholders.

12. Board / Senior Management Approval

SIGNED: 

NAME: Thanuj Thevar

JOB TITLE: Director

DATE: 20/4/26