Modern Slavery Statement

1 Introduction

Here are the steps that Mainline Instruments has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2023.

2 Definition of modern slavery

"Modern slavery" is a term which covers slavery (where ownership is exercised over a person); servitude (which involves the obligation to provide services imposed by coercion); forced or compulsory labour (which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself voluntarily); and human trafficking (which concerns arranging or facilitating the travel of another with a view to exploiting them, even where the person consents to the travel).

3 Overview

An overview of our organisational structure, key business activities and supply chains is as follows:

- Mainline Instruments operates in the optometry and ophthalmology sector as a medical device distributor. We also provide industry leading service and support contracts for the ophthalmic devices.
- Our business operating model is as a distributor to the United Kingdom and Ireland, to private and public organisations and businesses.
- Mainline Instruments is a privately owned limited business with a senior management team who are responsible for ensuring we continuously conduct business in a responsible manner.
- Our supply chain mainly comprises of the manufacturers of ophthalmic medical devices from the US, Europe and Asia. We also use suppliers who provide us with business services (such as print, marketing and IT services) and these are based in the United Kingdom.
- We recognise that some countries that we source from, can be high risk for modern slavery and therefore we are improving our processes and policies to mitigate this risk and ensure we work with responsible suppliers.

- We maintain membership to the OSA (Optical Suppliers Association) and Optic UK who are both trade associations in the UK for our sector. Optic UK is a trade association member of ABHI which enables us to keep informed of the ABHI Ethical Code of Business Practice.

We work closely with our main suppliers and customers; with our employees and their representatives to ensure the highest level of compliance with ethical trading initiatives.

4 Documentation

4.1 We have the following policies in place for employees:

- Labour standard assurance policy
- Code of conduct
- Corporate social responsibility policy
- Equal opportunity policy
- Grievance procedure
- Modern Slavery policy
- Recruitment and selection policy
- Safeguarding, children and vulnerable adults policy

4.2 These are referenced in our employee handbook, and copies are available on our intranet. All policies are reviewed and updated periodically, and we consult with managers and employee representatives prior to updating them.

4.3 Employees are reminded of the policies from time and time and notified of any updates.

5 Risk assessments

5.1 Our primary product portfolio is supplied by highly regulated medical device manufacturers from across the globe. As these manufacturers are subject to stringent medical regulation, we deem the risk of their operations to be low. Most of these organisations are in countries where the risk of modern slavery and human trafficking is low.

5.2 We carry out risk assessments with potential new suppliers to remain compliant with our Modern Slavery policy and to mitigate potential future risk.

6 Training

6.1 We will provide suitable training for all employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.

6.2 Employees and managers are informed of any updates to our policies via email and our intranet system.

6.3 Relevant senior management undertake externally provided training on modern slavery and human trafficking to ensure knowledge is kept up to date and relevant.

Approved by the Management Team on 11th January 2024