Eurosafe
SECURING THE NATION'S PPE

Modern Slavery Act Statement

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Table of contents:

Introduction

1. Organisational Structure
2. Supply Chain Transparency
3. Our Responsibilities
4. Summary & Accountability

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Modern Slavery Act 2015 Statement

Introduction

This statement is made pursuant to 54 (1) of the Modern Slavery Act 2015 and constitutes Eurosafe's slavery and human trafficking statement for the current financial year. The Modern Slavery Act 2015 requires larger companies to be transparent about their efforts to eradicate slavery and human trafficking in their supply chain. This statement, in accordance with the Act, lays out our policies and practices around recognising and preventing human trafficking and slavery in our business and our wider supply chain.

This statement is supported by our existing **Corporate Social Responsibility Policy** (in particular section 2. Human Rights practices, which addresses slavery) and our **Ethical Trading Policy** (section 4.1 addresses involuntary labour, freedom to leave and the holding of employee "deposits").

1. **Organisational Structure**
   Eurosafe is an association of 22 independent PPE Distributors across the UK and Ireland. Our combined annual turnover is in excess of £210m and we employ over 1,200 people. The principal of each of our member companies is also a Director on the Eurosafe board and share joint and several responsibilities. A Chairman and Vice Chairman are appointed every second year with the Vice Chairman always taking on the Chairman's role after his/her tenure as Vice.
   Eurosafe have a dedicated purchasing team, called SET (Supplier Engagement Team). This team is responsible for the selection and appointment of all suppliers. This includes checking the source of products and inspecting the supplier's manufacturing facilities.

2. **Supply Chain Transparency**
   Although suppliers to Eurosafe are from many different countries, nationalities and cultures, our **Ethical Trading Policy** represents Eurosafe's commitment to source goods and services only from persons and firms that achieve internationally recognized standards and practices in dealing with their workers and their working environment.
   All Eurosafe members agree to source products from companies who respect the standards laid down by the World Trade Organisation and UN Human Rights Initiative.
   The Eurosafe Group operates in a way which maintains acceptable practices with regard to their staff and the environment and requires its members and stakeholders to perform in the same way.
   We accept that some of our suppliers source materials and finished goods from countries where there are cultural and legal differences however we do expect and require that they consider these differences when they carry out their own business and we purchase from only those who do.
   Certain practices including the use of slave, bonded or child labour are unacceptable.
   We expect our member's employees to be treated fairly, work reasonable weekly hours with proper regard for their human rights and social conditions, with freedom of association and without fear of exploitation, discrimination or harassment.
   All employees should earn at least the minimum legal wage or minimum established within the industry to provide for basic living requirements.
   Eurosafe will not knowingly engage with any suppliers that operate poor labour practices that breach our code of conduct and we reserve the right to audit suppliers where we consider necessary.
   With the introduction of the Modern Slavery Act Eurosafe has committed to contact all nominated suppliers to ensure their ongoing commitment to the new legislation and will remove any suppliers unable to demonstrate compliance.

3. **Rights to Work in our Businesses**
   Eurosafe is committed to ensuring that right to work checks are carried out consistently and diligently in line with current UK legislation. Copies of documents are retained on the personnel file, with regular audits carried out to ensure that all sites are compliant with our internal procedures. Guidance relating to the importance of all pre-employment checks is provided to line managers along with training to ensure that illegal working is prevented.
   Following the completion of satisfactory background checks, all Eurosafe and its members' employees are given contracts at the start of the employment relationship. These are given to the employee for review, then signed by both the employee and Eurosafe or the respective member company, clearly stating the terms and conditions of engagement, and the voluntary nature of employment. Employees have the freedom to leave our employment at any time (subject to contractual notice) and any overtime in excess of standard contracted hours is also voluntary.

4. **Employment Agencies**
   Employment agencies contracted to supply temporary staff to Eurosafe members shall demonstrate commitment to and application of the requirements of this code.
   Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to members of Eurosafe are eligible to work in the UK by:
   4.1. Following Immigration and Nationality Directorate Guidelines on Amendments to Section 8 of the Asylum and Immigration Act 1996.
   4.2. Ensuring that the requirements of the Immigration and Asylum Act 1999 Section 22 Code of Practice are met.

4.3. Retaining copies of identity papers, work permits or passport stamps as detailed in the Home Office List of Specified Documents and UK Passport Stamps.

Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to members of Eurosafe have sufficient command of English to understand:

4.4. The agency's responsibilities under this code of practice.

4.5. Eurosafe members' Health & Safety requirements.

4.6. Written statements of employment particulars.

4.7. Or have other measures in place to ensure that all these requirements are communicated in the employee's native language.

5. Our Responsibilities

The Eurosafe group and its member companies are committed to working only with suppliers and manufacturers who do not comprise the basic human rights of their employees. We seek to develop business relationships with suppliers who have a respect for our ethical standards in the context or their own particular country's/region's culture. In order to achieve our objective, we set high standards of behavior for ourselves and that of our suppliers and stakeholders.

We feel it is important for us to have our own strict policy on Ethical Trading and to make our suppliers aware of this so they understand our business values. We require our suppliers to be able to trace the social impact they cause by their operations locally and further afield from the sourcing of raw materials and goods through to all levels of manufacturing, distribution and sales. This is detailed in our **Ethical Trading Policy** and those of our member companies.

If we find out that a supplier has breached our ethical trading policy, we work with them to try and resolve the issues. We believe it is more beneficial to over-come these issues rather than cease trade with them straight away. By working with suppliers to overcome their ethical issue we are securing the long-term security of their community.

Any suppliers not willing to work with us in this way will ultimately suffer the result of us ceasing trading with them.

In compliance with our ethical trading policy contracts and agreements are made clear in writing for the avoidance of doubt or question.

All employees will be provided with ethics training as part of their induction programme. Ongoing ethics training, as the ethics policy and procedure develops will be cascaded to employees across the group via individual Directors of member companies.

6. Summary and Accountability

Both our Ethical Trading and Corporate Social Responsibility Policies support the fact that we do not condone child, forced, indentured or bonded labour but seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations. The principles embodied in our policies reflect our position related to but not limited to slavery, human trafficking, antitrust, anti-bribery and anticorruption and protection of the company's assets and reputation.

We encourage anyone (including employees, sub-contractors, suppliers and clients) to report in good faith any issues or concerns about potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices such as fraud or bribery.