



# Modern Slavery Policy Statement

PORTMAN dental care

# Overview

At Portman Dental Care, we are relentless in our pursuit of quality and excellence when providing dental care for our patients. We use our professional expertise with integrity, aligning our actions to the highest standards of business conduct and putting our patients at the heart of our actions.

Modern slavery is a crime and a violation of fundamental human rights. This statement underlines our commitment and actions to ensuring modern slavery is not taking place anywhere in and around our organisation.

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# Portman Dental Care – who we are

Portman Healthcare Ltd are a limited company registered in England (registered company number 6740579) providing dental care through the brand of Portman Dental Care. Established in 2009, the group has over 160 practices across the UK. The group was founded by Sam Waley-Cohen, who is the Chief Executive Officer.

Our vision is to be the best Private-focused dental group in the world. We achieve this by:

- Putting patients at the heart of everything we do;
- Delivering consistently great dental care;
- Innovating, improving and growing;
- By being at the heart of every local community; and
- By being an amazing place to work.



## Our approach to the Modern Slavery Act

Our values build on the visions of the business and the central value is to treat everyone how we would want to be treated ourselves.

As a group, we work to the highest professional standards and comply with all laws, regulations and rules which are relevant to our business.

We expect the same high standards from those we work with and are 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 is published within our handbook, within all our practices and all teams receive training in this area.

We work with our practices to ensure that our Anti-Slavery Policy is complied with, and we manage any breaches or concerns. We have amended our Whistleblowing Policy to include the area of Anti-Slavery to ensure that anyone can raise a concern without the fear of disciplinary action.

We also ensure our colleagues have a way to raise concerns as part of our Whistleblowing procedures.



COMPLIANCE

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## Portman Dental Care's supply chain

As a dental group, we do not have an extensive supply chain of raw materials coming into the business. However, we do purchase a wide range of goods and services from a large number of suppliers. We attach great importance to the supply side of our value chain. Our suppliers provide critical goods and services that keep our organisation alive and give us the ability to deliver to our patients. These include the businesses that supply the IT infrastructure and services to support our practices, the global and UK-based re-sellers of consumables and equipment to support our practices and the facilities and building maintenance required to safely and securely provide for our rapidly growing workforce.

These goods and services include the following:

- The IT infrastructure and services to support our practices and our central teams.
- The re-sellers of dental consumables and equipment to provide an outstanding patient journey
- The facilities and building maintenance that is required to safely and securely provide for our rapidly growing workforce.
- The consulting, accounting, and legal services from the hundreds of smaller suppliers who enable us to operate effectively.

Our suppliers are distributed predominantly in the UK. Where possible we support local suppliers and this is reflected in the distribution of our procurement of goods and services by location. We pride ourselves on the strength of the relationships we have with local suppliers, some of whom have supported us since we started out in 2009. Wherever possible, and practical, we believe in supporting our local community through our procurement decisions.

We define our expectations of our suppliers by implementation of our Supplier Code of Conduct. This sets out our core values covering the areas of human rights, labour standards, the environment, and anti-corruption. We already meet many of these requirements and encourage our suppliers to also support best practices. We communicate best practices through the Portman's Terms of Business, and the Portman Code of Business Conduct.

We adopt a zero-tolerance approach to modern slavery and human trafficking and will not accept business from any supplier that does not comply with Portman Dental Care's approach, or is not prepared to sign our Supplier Code of Conduct.

At present, we are not aware that any of our current supply chains are sourcing from high risk geographies or industries.

For all new suppliers or business partners, we will only engage their services once we are satisfied that they comply with and have signed our Supplier Code of Conduct. Should any supplier fail to comply with our Code of Conduct, we will offer to help them identify the steps they will need to take to comply.

**(Please see the 'Supplier Code of Conduct' on page 7)**

Our recruitment is managed within the group for employees and self-employed clinicians. We have robust policies in place to ensure the new joiner has the Right to Work in the UK and have confirmed their identity prior to the commencement of their placement.

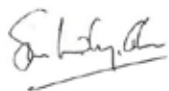


## Further steps

**We commit to undertaking the following measures:**

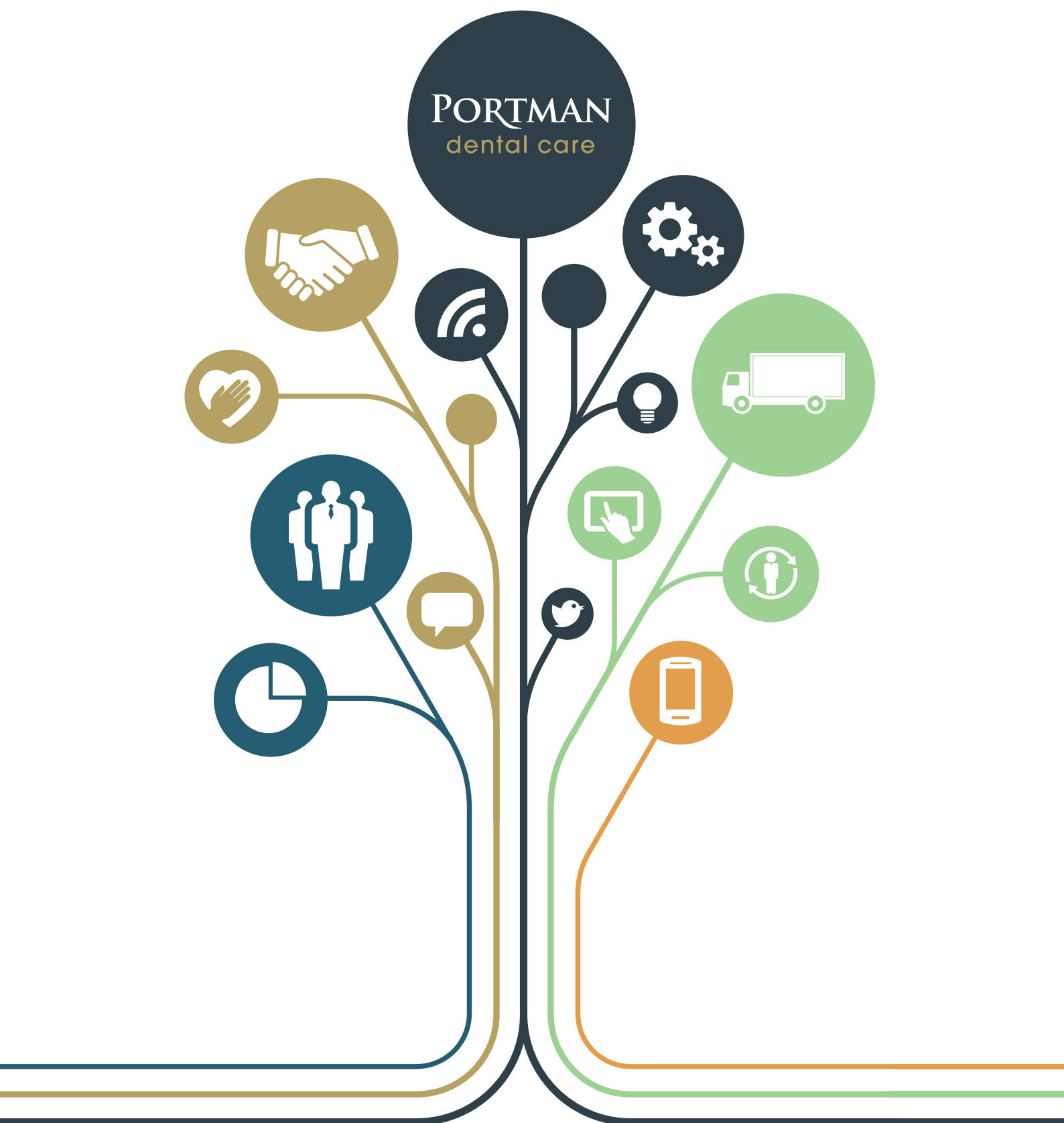
- Provide regular training for all team members;
- Obtain contractual warranties that no slavery is used anywhere in the supplier's business or by any of the suppliers in its supply chain and that all necessary processes and policies have been put into place to ensure that this remains the case;
- Obtain a contractual right to request compliance-related information and the right to audit suppliers at our discretion;
- Add an indemnity provision and right to terminate for breach of our Anti-Slavery Policy into our contracts; and
- Carry out an annual review of this statement in line with our ongoing monitoring & checking procedures to eliminate modern slavery and human trafficking.

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 30 September 2020.



**Sam Waley-Cohen** Chief Executive Officer  
August 2021





Supplier code of conduct



## Overview

Portman Dental Care's Supplier Code of Conduct ("Code") describes our corporate responsibility requirements from our suppliers ("Suppliers") that provide products or services to Portman Dental Care. Portman Dental Care requires suppliers and their employees to commit to this Code as a condition of doing business.

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# Key expectations

## Employment standards and human rights

### Child labour

Portman Dental Care is opposed to the use of any form of child labour or practices that inhibit the development of children. Suppliers must comply with all child labour laws and should not employ anyone under the age of 15, or where it is higher, the mandatory school leaving age in the local country.

### Forced or involuntary labour

Suppliers must not participate in human trafficking; use forced, involuntary, or slave labour; or purchase materials or services from companies using forced, involuntary, or slave labour. They must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.

### Compensation and working hours

Suppliers must comply with the applicable wage and hour labour laws and regulations governing employee compensation and working hours. Suppliers should conduct operations in ways that limit overtime to a level that ensures a humane and productive work environment.

### Diversity and equality

Suppliers should aim to provide equality of opportunity and treatment regardless of race, colour, gender, religion, nationality, sexual orientation, age, or disability. Suppliers are expected to support equal pay for work of equal value. Suppliers must oppose discrimination or intimidation towards employees including all forms or threats of physical and psychological abuse.



# Ethics and integrity

To meet social responsibilities, suppliers are required to conduct business in an ethical manner and act with integrity.

## Business integrity

Suppliers shall not practice or tolerate any forms of corruption, extortion or embezzlement. Monitoring and enforcement procedures shall be implemented to ensure conformance. Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted, including any money, object of value or preferential treatments. These requirements are in addition to more specific obligations in respect of responsible business and anti-bribery included in the contractual terms of business or supply agreement(s) with Portman Dental Care.

## Sourcing conflict-free minerals

Suppliers are required to eliminate the use of conflict minerals. Portman Dental Care will continue to promote responsible mineral sourcing and expect suppliers to communicate our conflict-free policy with next-tier suppliers. Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customer upon customer request.

## Disclosure of information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

## Fair business and competition

Suppliers shall uphold all standards of fair business, advertising and competition, including all laws and regulations.

## Whistle-blower protection and anonymous complaints

Suppliers shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Suppliers shall protect whistle-blower confidentiality and prohibit retaliation.





## Health and safety

Portman Dental Care's suppliers will make proper provision for the health, safety and welfare of their people, visitors and contractors and those in the community who may be affected by their activities. A safe and hygienic working environment should be provided and best occupational health and safety practice promoted, bearing in mind the prevailing knowledge of the industry, and of any specific hazards.

## Environment

Suppliers are expected to conduct their operations in a way that minimises the impact on natural resources and protects the environment, customers, and employees. They must ensure their operations comply with all laws related to air emissions, water discharges, toxic substances, and hazardous waste disposal. Suppliers must maintain sufficient knowledge of input materials and components to ensure they were obtained from permissible sources, in compliance with laws and regulations. Suppliers may be required to validate this origin.



## Proprietary information and IP

Any information, personal data, technology, know how or IP that suppliers receive, or have access to, through dealings with Portman Dental Care must be kept confidential and never used for personal gain or outside of the scope of supplier's assignment with Portman Dental Care. This includes both commercial and technical information. Appropriate non-disclosure or confidentiality agreements are and will continue to be used to formalise the process of protecting proprietary information. Refer to the contractual terms of business or supply agreement(s) with Portman Dental Care or existing non-disclosure agreements for details on obligations relating to proprietary and confidential agreements.

Suppliers may not use the Portman Dental Care trademark, images, or other materials to which Portman Dental Care owns the copyright, unless explicitly authorised.

Suppliers shall have an ongoing process to create and maintain documents and records to ensure regulatory compliance, to enable audit where appropriate, and conformity to the Code and the contractual terms of business or supply agreement(s) with Portman Dental Care.

# Management commitment

Portman Dental Care believes that sound management systems and commitment is the key to enriching the social and environmental well-being of our supply chain. Portman Dental Care holds suppliers accountable to this Code and all of its standards and suppliers are required to fulfil the expectations set forth by allocating appropriate resources to fulfil the requirements described. Suppliers shall implement or maintain, as applicable, a management system that facilitates compliance with this Code and with the law, and identifies and mitigates related operational risks while facilitating continuous improvement.

## Risk assessment and risk management

Suppliers shall have a process to identify the environmental, health & safety and labour practice and ethics risks associated with their operations. The process shall determine the relative significance of each risk and the implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

## Continuous improvement

Suppliers are expected to continuously improve their performance in general and by implementing appropriate measures to help them comply with labour, health and safety and environmental standards required by this Code. Suppliers shall have a process for timely correction of deficiencies identified by assessments, inspections, investigations and reviews undertaken by themselves or other third-parties.

## Supplier responsibility

The Supplier will be responsible for cascading this or a similar policy through their supply chain as appropriate. As a minimum the policy should maintain the levels of corporate responsibility described in this document.

# Communication

Suppliers are expected to assist Portman Dental Care in enforcing this Code by communicating its principles to their supervisors, employees, and suppliers.

Any supplier may direct questions or comments about this Code to Portman Dental Care Head of Procurement.

**Note:** Violations of the Portman Dental Care Supplier Code of Conduct should be reported in confidence to the Head of Compliance, Portman Dental Care, Rosehill, New Barn Lane, Cheltenham GL52 3LZ, England or the Portman Dental Care Head of Procurement, Rosehill, New Barn Lane, Cheltenham GL52 3LZ, England.

