

Modern Slavery Statement – April 2019

1.0 Introduction and Scope

This statement sets out Boots Hearingcare actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

The company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This statement covers the activities of Boots Hearingcare Ltd a healthcare retailer in the UK, dispensing private hearing aids to customers, produced by hearing aid instrument manufacturers.

2.0 Assessing Risk

Our assessment of our suppliers is that the process of manufacturing hearing aids is a specialist technical market where extensive training is required for any person to be able to produce and manufacture a hearing aid instrument, reducing the risk that any person employed was at risk of being subject to modern day slavery or human trafficking.

3.0 Responsibility

Responsibility for the company's anti-slavery initiatives is as follows

Policies: The HR Director is responsible for putting in place and reviewing policies and the process by which they were developed.

Risk assessments: The Commercial Director has responsibility for human rights and modern slavery risk analysis in our supply chain.

Investigations/due diligence: The HR Director and Managing Director are jointly responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.

4.0 Relevant Policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Whistleblowing policy The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains

of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline.

Employee code of conduct The Company's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Recruitment policy The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

5.0 Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;

Evaluating the general human rights of each new supplier

Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.

5.0 Training and Awareness-raising programme

Training

The organisation requires HR and Commercial teams to sign up to complete an annual online training course each year to keep their knowledge and awareness updated.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by distributing posters to encourage colleagues to speak up.

6.0 Measuring Effectiveness

The company has reviewed its key performance indicators (KPIs). As a result, the organisation is:

Issuing its mandatory on-line training to be completed by June 2019

Review current suppliers as captured on the financial system as being paid as a supplier to update assessments and evaluations for 2019/20.

This statement was approved on the 4th April 2019.

Sharon Brand

Rob Skedge

HR Director

Managing Director