

# Modern Slavery Statement

Lenstec (Barbados) Inc Modern Slavery Act 2015 Statement



The following information has been produced by Lenstec (Barbados) Inc, referred to throughout as “Lenstec”, to fulfil the obligation set out in Section 54, of the UK Modern Slavery Act 2015. This document will be made publicly available on our website and copies will be supplied annually to all suppliers in our supply chain.

## Introduction

Lenstec do not tolerate any form of modern slavery or human trafficking in any area of its business or supply chain. To eliminate the risk of this, Lenstec have established an effective system to detect, monitor and safeguard against instances of modern slavery within the business and supply chain.

## Our Business

Lenstec are a leading manufacturer of intraocular lenses and distributor of consumable medical products for cataract and refractive surgery. Lenstec (Barbados) Inc, located in Wakefield, West Yorkshire, UK is an overseas branch of Lenstec Barbados Inc, located in Christ Church, Barbados, which is a manufacturing arm of our overarching Headquarters, Lenstec Inc based in Florida, (USA). Our products are currently marketed in more than 60 countries world-wide.

## Policies

Lenstec, operate numerous internal policies and procedures, that are reviewed annually and made publicly available on our website. Lenstec have completed the online Modern Slavery Assessment (MSAT) and currently hold a score of 85% as of 2023.

## Due Diligence

At Lenstec, we have established a formal supplier approval process, honed and tested over several years. Prior to engaging with potential suppliers for goods and services, we require completion of a comprehensive supplier questionnaire aimed at assessing any risk of modern slavery within their supply chains. These questionnaires are meticulously reviewed by Lenstec to evaluate potential risks.

Furthermore, all suppliers are required to undergo annual risk assessments and complete updated questionnaires, ensuring ongoing vigilance against modern slavery in our supply chain. These assessments form an integral part of our modern slavery assessment tool.

If a supplier is identified as “High Risk” or above, we conduct a thorough assessment to determine the nature of the risk. Lenstec collaborates closely with the supplier to develop a corrective action plan aimed at addressing any identified issues. Should a supplier fail to demonstrate a commitment to rectifying concerns related to modern slavery within their supply chain, we will conduct a thorough investigation and, if necessary, terminate our relationship with that supplier.

Additionally, Lenstec has established a formal whistleblowing system accessible to both employees and third parties. This system provides a channel for reporting suspicions of modern slavery, which are promptly and thoroughly investigated. Our whistleblowing system is openly available for review on our website, underscoring our commitment to transparency and accountability in combating modern slavery.

## Supply Chain

Lenstec procure a range of goods from numerous suppliers world-wide. Each supplier along with their suppliers (Tier 2) are documented and assessed for risk each year. First by assessing any risk flagged in the country of origin of the supplier and then its working practices by way of a questionnaire. Evidence of working conditions and practices is also requested and assessed.

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As stated above, due diligence is carried out on all suppliers using our modern slavery assessment tool. In line with our own modern slavery statement, which is made available to all suppliers, which we require them to adhere to the following,:

- Child labour in any form along with forced and compulsory labour be prohibited.
- Employees should have the right to collective bargaining or to join trade unions of their own choosing.
- Suppliers are to treat all employees with dignity and respect, not engage in the use of corporal punishment, mental or physical coercion. Harsh or inhumane treatment will not be tolerated.
- Suppliers provide a safe and healthy working environment, free from all forms of discrimination, harassment and abuse.
- Employers will comply with their own country's laws and practices regarding wages/remuneration and working hours, ensuring the minimum requirements are met.

Where possible we try and maintain close working relationships with suppliers, so that complete transparency into their working practices is made available and breaches be easily spotted, highlighted and addressed.

### Training

Lenstec provide training from internal and external sources to all members of staff, on all its policies and procedures. Annual reviews are carried out and further training, if needed is given to all employees.

A brief overview of company activity and policy changes etc. is produced and emailed to employees at the end of each year.

Key performance indicators are used to measure the effectiveness of our policies and procedures and highlight areas where improvement and further training is needed.

This statement has been made by Lenstec (Barbados) Inc, in line with the requirements set out in Section 54, of the Modern Slavery Act 2015 for the financial year ending 31<sup>st</sup> December 2023.

Produced By :

A handwritten signature in black ink that reads "N. Smallwood".

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Authorized By:

A handwritten signature in black ink that reads "J. Woodward".

Jim Woodward, Sales Director UK  
Lenstec (Barbados) Inc