

Modern Slavery and Human Trafficking Statement 2021

Circle Health Holdings Limited

Circle Health Group Limited

Circle Health Limited

Introduction

Circle Health Holdings Limited is the holding company for Circle Health Limited and Circle Health Group Limited (together referred to as “Circle”), the UK’s largest private hospital group, providing clinical services to NHS-funded, self-paying and privately-insured patients. We have more than 50 hospitals and clinics across the UK, providing 115 different specialties and services and a range of outpatient services.

Circle is committed to preventing acts of modern slavery and human trafficking within its business and supply chain and requires that our suppliers are similarly committed. Whilst Circle’s suppliers are predominantly based in the UK, our supply chain extends globally and we acknowledge the potential risks that this can pose. We recognise that unsafe and unethical practices can affect any sector or industry and we take seriously our responsibility to be alert to the risks, however small, both in our business and in our wider supply chain. To this end, we undertake the following steps to ensure we comply with relevant UK legislation and to mitigate the risk of modern slavery and human trafficking in our supply chain, including:

- conducting due diligence on all our existing suppliers; to
- complying with our Modern Slavery Policy (“MSP”) when executing our audit, monitoring, and reporting processes; and
- incorporating the key elements of our MSP into our contractual approach in engaging new suppliers; and
- continuing to monitor and audit suppliers Circle considers higher risk of having Modern Slavery present in their own supply chain. For example, providers of single use instruments, uniforms, PPE, cleaning contractors and other outsourced services.

During the COVID-19 Pandemic, the majority of our personal protective equipment (PPE) and Lateral Flow Test (LFT) requirements were supplied by NHS Supply Chain via Clipper Logistics as a coordinated and strategic sourcing initiative to ensure that sufficient levels of PPE were available across all providers (NHS and independent sector) under the NHS Contracts. Until the current arrangement expires in March 2023, Circle will continue to source from the NHS Supply Chain for the majority of PPE and LFTs. Due to the variety of products supplied, we have relied on the due diligence carried out and assurance provided by NHS Supply Chain that it has addressed the requirements of the Modern Slavery Act for these suppliers.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, Circle has a documented process for approving third-party suppliers. Circle requires suppliers to provide a copy of their Modern Slavery Policy or Statement, confirming their compliance with the Modern Slavery Act 2015. Any supplier who does not provide sufficient information or assurance is required to provide written responses regarding quality, environmental aspects, health and safety, information security, equal opportunities, recruitment standards, and other relevant aspects of their employment and production practices. A full supplier review process is completed prior to appointment or on contract renewal, and ad hoc

reviews are undertaken where any concerns arise. We maintain an Approved Supplier Register that records all vetted third-party suppliers to the Group.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of modern slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistle-blowers.

In 2021 we reviewed, and risk assessed the modern slavery statements and policies of our top 125 suppliers which represented 70% of our overall spend. To date we have not identified any concerns or issues with any of our supply chain.

Circle is in the process of implementing a new supplier onboarding system, which will require all suppliers to annually self-certify and upload a copy of their Modern Slavery Policy and any relevant documentation before they are approved to conduct business with the Group. Suppliers will be required to ensure that relevant documentation remains accurate throughout the period of their engagement.

Pending implementation of this new system, the Group has introduced more stringent pre-qualification and tendering criteria, especially where we have identified higher risk for modern slavery conditions in their supply chains.

Policies and Training

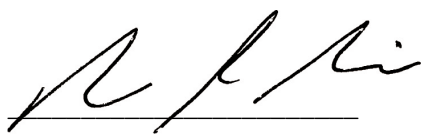
We require our suppliers and our business partners to affirm that they comply with the requirements of the Modern Slavery Act 2015 as part of the formal contracting process. Our standard supplier terms and conditions expressly refer to the Act and our expectation of transparency both by the particular supplier and in its own supply chain.

In addition to our MSP, we have adopted a Whistleblowing Policy to encourage the escalation of any concerns regarding our business practices or those of our suppliers. As we work with a range of suppliers to provide high quality healthcare services to our patients, we also seek to ensure our suppliers are aware of our MSP and adhere to the same high standards that we do.

Safeguarding training has also been widely implemented within the Group, helping staff to identify individuals who may be at risk and how to escalate any concerns. Our induction training programme also includes a stand-alone module covering how to identify modern slavery and trafficking and actions to take if a staff member believes someone is a victim of modern slavery or human trafficking.

Further Questions and Raising Concerns

Any questions or concerns regarding our MSP or the presence of modern slavery or human trafficking in our supply chain should be directed to the Group's Director of Procurement and Supply Chain, Robert Botwright (Robert.botwright@circlehealthgroup.co.uk).



Paolo Pieri, Chief Executive Officer

Circle Health Holdings Limited

June 2022