



Modern Slavery and Human Trafficking Statement for year ending 31 December 2023

Circle Health Holdings Limited
Circle Health Group Limited
CHG Management Services Limited

This statement is made on behalf of Circle Health Holdings Limited (company number 10543098), Circle Health Group Limited (company number 02164270) and CHG Management Services Limited (company number 05042771) (together **Circle**) pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**) and constitutes our modern slavery and human trafficking statement for the financial year ended 31 December [insert year]. This statement is made on behalf of Circle and sets out the steps that we continue to take to prevent modern slavery and human trafficking in our business and supply chains.

OUR STRUCTURE

Circle Health Holdings Limited is the parent company for Circle Health Group Limited and CHG Management Services Limited.

OUR BELIEFS

Circle has zero tolerance to slavery and human trafficking.

Circle is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. Circle requires that its suppliers are similarly committed, wherever based.

Circle's aim is to provide the high quality, safe and compassionate care our patients need and expect. Circle's values and credo underscores all that we do. We consider that patients come first and as such, patients are always at our core and we are, above all, the agents of our patients. We believe in our people. The best results will come from the best people caring together and from empowering our people to do their best. Circle's mantra is that "good enough" never is. We are unrelenting in the pursuit of excellence, and we never compromise on ethics, quality, or safety. We reflect these beliefs through our staff and contractor engagement and take all steps ensure that our principles are adopted in the delivery of quality safe care.

OUR BUSINESS AND SUPPLY CHAINS

Operating across England, Wales and Scotland, Circle is 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 has around 6,500 Consultants with Practising Privileges, and 13,500 employees (approximately 3,500 are part time 3,900 are bank staff).

Circle's supply chain is diverse, ranging from office supplies through to complex surgical equipment and medicines. While our supply chain is based in the UK, our suppliers' supply chains extend globally.

Areas of our supply chain which we consider higher risk of having modern slavery or human trafficking present in *their own* supply chain include providers of single-use instruments, uniforms, personal protective equipment, and other outsourced services for example linen and laundry.

OUR POLICIES

Our Modern Slavery Policy (**MSP**) reflects our commitment to implementing effective systems and controls to ensure modern slavery and human trafficking is not taking place in any part of our business or supply chains. We require our suppliers and our business partners to affirm that they comply with the requirements of the Act as part of the formal contracting process; we seek to ensure that our suppliers are aware of our MSP and adhere to the same high standards

that we do. 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, including the right to audit supplier compliance.

We comply with all applicable UK employment legislation and all our employment policies are available to employees on our intranet.

Circle maintains a Freedom to Speak-up Policy (which includes Whistleblowing) to encourage the escalation of any concerns regarding our business practices or those of our suppliers. Any questions or concerns regarding our approach to, or the presence of, modern slavery or human trafficking in our business or supply chain should be directed to the Group's Director of Procurement and Supply Chain, Robert Botwright (Robert.botwright@circlehealthgroup.co.uk).

Our policies are periodically reviewed in line with best practice and any changes to process or legislation are updated as required.

We undertake the following steps to ensure that we comply with UK legislation and to mitigate the risk of modern slavery and human trafficking in our supply chain, including:

- induction training;
- conducting due diligence on new and existing suppliers;
- complying with our MSP when executing our audit, monitoring, and reporting processes;
- incorporating the key elements of our MSP into our contractual approach in engaging new suppliers; and
- continuing to monitor and audit higher risk suppliers.

Circle has been rationalising its supply chain to ensure we continue to cultivate relationships with reliable and reputable suppliers. Further, we have increased our minimum hourly rate above the national living wage, with an enhanced rate for sites closest to central London.

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 suppliers. Circle requires suppliers to provide a copy of their Modern Slavery Policy or statement, confirming their compliance with the Act.

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 and on contract renewal (where applicable). In the event of any concerns arising, we would undertake a joint audit with the supplier and if the supplier cannot, or will not, disarm our concerns then we would not hesitate to immediately cease dealings with a supplier.

We maintain an Approved Supplier Register that records all vetted suppliers to the business.

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.

OUR TRAINING

Our induction training programme includes a stand-alone module covering how to identify modern slavery and human trafficking. This training includes advice regarding the actions to take if a staff member believes someone might be a victim of modern slavery or human trafficking.

Safeguarding training has also been widely implemented within the business, helping staff to identify individuals who may be at risk and how to escalate any concerns.

USE OF AGENCY

As with all other UK hospital operators, at Circle we also use limited agency staff where required. When utilising agency staff Circle only use a single, reputable, third-party neutral vendor who sources and vets all Circle's agency workers. Our neutral vendor undertakes candidate compliance checks and a programme of regular audits to ensure that workers' right to work, ID verification and professional qualifications are valid and maintained throughout the duration of their placement. Further, all agency suppliers via the neutral vendor have Anti-Bribery and Anti-Slavery provisions in their contracts and are required to provide a copy of their Modern Slavery Policy/Statement (should they be required to have one).

Generally, most agency staff are paid more than the minimum wage and are highly qualified. This making agency staff a lower risk category of modern slavery.

RISK ASSESSMENT AND EFFECTIVENESS

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 have assessed the overall risk of modern slavery within our business and supply chain to be low, however, we recognise that unsafe and unethical practices can affect any sector or industry. We therefore take our responsibility to be alert to the risks, however small, both in our business and in our wider supply chain seriously.

The risk of Modern Slavery occurring in any part of our business or supply chain is being proactively managed through the measures described in this Statement.

There have been no incidents of modern slavery or human trafficking reported for the year ended 31 December 2023.

TARGETS FOR THE YEAR AHEAD

In 2023, Circle stated it was implementing a new supplier management system for on-boarding new suppliers and annually revalidating existing suppliers. Implementation of this system has been delayed until 2024 in order to align this system with that of the NHS. Circle considers that, as the majority of suppliers will be familiar with this system through their NHS contracts, this approach will streamline on-boarding and improve quality of information provided.

Under the new system all suppliers will be required to annually self-certify their compliance with the Act and to upload a copy of their Modern Slavery Policy and any relevant documentation through a portal before they are approved to conduct business with Circle. Suppliers will also be required to ensure that relevant documentation remains accurate throughout the period of their engagement.

For the year ahead we will continue to ensure that:

- detailed due diligence is conducted on all of our suppliers and that we continue to review our procurement procedures to consider if any adjustments could be made to further reduce the level of risk of slavery and human trafficking in our supply chains;
- we keep under view our internal processes to identify what further steps can be taken to ensure that our obligations under the Act are met and that our MSP is effectively implemented and complied with all of our staff undertake training appropriate to their role; and
- we continue to monitor and champion best practice and any proposed legislative changes in the area.

We will review progress regularly and report in our next statement against the above.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Circle's Slavery and Human Trafficking Statement for the financial year ending 31 December 2023.

The statement was approved by the Board on 25 June 2024 and signed on behalf of the Board by Paolo Pieri, Chief Executive Officer, Circle Health Holdings Limited.



Paolo Pieri, Chief Executive Officer
Circle Health Holdings Limited