



## Modern Slavery and Human Trafficking Statement for year ending 31 December 2022

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 slavery and human trafficking statement for the financial year ended 31 December 2022. 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 holding company for Circle Health Group Limited and CHG Management Services Limited.

### Our business and supply chains

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 13770 employees (approximately 3524 are part time and approximately 4076 are bank staff).

Our supply chains are predominantly based in the UK, however, our supply chain does extend globally.

The 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, cleaning contractors and other outsourced services.

### Our approach

We have 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.

### 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.

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

We maintain a Whistleblowing Policy to encourage the escalation of any concerns regarding our business practices or those of our suppliers.

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](mailto:Robert.botwright@circlehealthgroup.co.uk)).

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:

- 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.

## **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, Circle would undertake ad hoc reviews.

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.

## **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 2022.

## Training

Our induction training programme includes a stand-alone module covering how to identify modern slavery and 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.

## Targets for the year ahead

Circle is in the process of implementing a new supplier management system, which will require all suppliers 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.

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

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
- we continue to monitor 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 2022.

The statement was approved by the Board on 16 November 2023 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

Note: this is an updated version of the statement published originally in June 2023. This updated version updates the structure of the statement and consequently includes further information as appropriate. The risk

for the year ending 31 December 2022 has not changed.