



Modern Slavery and Human Trafficking Statement for year ending 31 December 2025

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 2025. 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 to 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 has the largest number of private hospitals in the UK, 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 suppliers are mainly based in the UK, their supply chains may extend globally, ensuring our patients have access to products and services most appropriate for their needs and circumstances.

Areas of our supply chain which we consider to be at a higher risk of having modern slavery or human trafficking elements include providers of single-use instruments, uniforms, personal protective equipment and other outsourced services such as linen and laundry.

Circle has established a reliable and reputable supply chain. Further, Circle's minimum hourly rate is above the national living wage, with an enhanced rate for sites closest to central London.

OUR POLICIES

Our Modern Slavery Policy (**MSP**) reflects our commitment to implementing effective systems and controls to ensure modern slavery and human trafficking does not take place in any part of our business or in our supply chain. 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 within 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 can be directed to the Group's Procurement and Supply Chain Director, Robert Botwright (robert.botwright@circlehealthgroup.co.uk) or via the freedom to speak-up process.

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 assess higher risk suppliers.

DUE DILIGENCE

Circle uses a supplier management system called Atamis for onboarding new suppliers and to support annual revalidation of existing suppliers. Atamis requires all suppliers to annually self-certify their compliance with the Act, including providing their Modern Slavery Policy and any relevant documentation before they are permitted to continue to do business with Circle. Suppliers are obliged to ensure that relevant documentation remains accurate throughout the period of their engagement.

Suppliers are also 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 a joint audit with the supplier and, if the supplier cannot, or will not, resolve our concerns then Circle ceases dealing with such 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 whistleblowers.

OUR TRAINING

Our induction training programme includes a standalone 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 is common with all other UK hospital operators, Circle uses limited agency staff, from time to time. When utilising agency staff, Circle uses 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, 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 were no incidents of modern slavery or human trafficking reported for the year ended 31 December 2025.

TARGETS FOR THE YEAR AHEAD

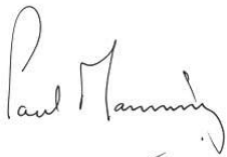
For the year ahead we will continue to ensure that:

- due diligence continues on 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 review 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 and that all of our staff undertake training appropriate to their role; and
- we continue to champion best practice and monitor 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 2025.

The statement was approved by the Board on 11 May 2026 and signed on behalf of the Board by Paul Manning, Chief Executive Officer, Circle Health Holdings Limited.



Paul Manning
Chief Executive Officer
Circle Health Holdings Limited