

## Modern slavery statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**) and sets out the steps taken by Spire Healthcare Group plc, and other relevant group companies<sup>1</sup> (**Spire Healthcare**), in preventing modern slavery and human trafficking in its business and supply chains. This statement covers the calendar year 2023 (also Spire Healthcare's financial year).

## Our structure, business and supply chains

Spire Healthcare is one of Britain's largest independent healthcare companies, operating across England, Wales and Scotland. During 2023, working in close partnership with NHS trusts and around 8,650 experienced consultants, our hospitals, clinics and medical centres delivered personalised care for over 1 million patients across all of our operations. Spire Healthcare Group plc is a public company quoted on the London Stock Exchange (SPI: LSE) and its registered office is 3 Dorset Rise, London EC4Y 8EN. You can read more about the business in our latest annual report.

At the heart of Spire Healthcare is our updated purpose to '*make a positive difference to people's lives through outstanding personalised care*'. This underpins everything we do. We strive to deliver our purpose by living our six values, which include: '*Doing the right thing*' and '*Caring is our passion*'. These values, in particular, demonstrate our people-focused approach and commitment to act ethically and with integrity in all our relationships.

Our approach to tackling the risk of modern slavery continues to evolve under the oversight of our sustainability committee, which reports to our executive committee to ensure that our directors are sighted on relevant matters. The sustainability committee includes senior representatives from Spire Healthcare's legal, people, supply chain and procurement, operations, internal audit and risk functions.

As a national, multi-site organisation, we source a wide range of goods and services, from surgical equipment, consumables and medicines, through to food ingredients, laundry, clothing and waste disposal services. Some of these products and services are used in the provision of healthcare to patients, such as joint prostheses, while others will be used in day-to-day business operations, such as office supplies. We engage thousands of suppliers across Spire Healthcare, making our end-to-end supply chains extensive and complex. However, 80% of total spend is

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<sup>1</sup> This statement relates only to Spire Healthcare Group plc and Spire Healthcare Limited

concentrated with c.215 suppliers. At tier-one (direct) level, 98.6% of our suppliers are UK-based businesses. However, to date we have limited visibility at tier-two level and above. While we recognise that UK-based businesses are not free from susceptibility to modern slavery practices, we acknowledge that it is often in the remote parts of a long global supply chains where there is heightened risk.

Spire Healthcare's standard terms and conditions require suppliers to adhere to stringent warranties, representations and undertakings, including a commitment to conduct regular training for all affiliates, officers, employees, agents and subcontractors, to drive transparency to eliminate modern slavery across our supply chain.

### **Due diligence processes**

In 2023, we maintained our modern slavery due diligence process for all material new suppliers (those with an annual spend in excess of £1m), whereby if any such supplier is deemed medium or high-risk based on internally-developed scoping criteria, then they would be further risk assessed through a detailed modern slavery questionnaire. There were no issues identified via this process. If an issue were to arise then, on a case-by-case basis, we would first seek to address this by working with any supplier where there is realistic prospect of remedy/reform. However, we would not hesitate to immediately cease dealings with a supplier, or engage with alternative suppliers, if necessary.

### **Risk assessment and management**

We recognise that, while we are a UK-based business, modern slavery is a complex, global issue which affects the healthcare sector. The two principal areas of focus in our business are at front-line level, to safeguard patients, colleagues and others who come through our facilities, and in our supply chain.

In our business operations, we believe practitioners and colleagues are well placed to identify and deal with modern slavery concerns through the safeguarding training and protections we have in place. The safeguarding system trains those practitioners and other colleagues (clinical and non-clinical) to recognise and report signs of abuse. We believe the rigour of this system mitigates the risk of modern slavery from either going undetected or being inadequately dealt with at front-line level. This risk is further controlled by the support, training and infrastructure in place for all colleagues to be able to raise concerns, through our network of local 'Freedom to Speak Up Guardians', or other available channels including our central concerns e-mail and, if necessary, via a confidential external helpline.

Under Spire Healthcare's procurement policy, which was updated in early 2023, our hospitals and clinics are equipped with guidance and a risk assessment tool for evaluating modern slavery risks in local contracts. The vast majority of people who run our business are employed, and must satisfy all necessary employment checks for their role. We have also increased our minimum hourly rate above the statutory national living wage, with an enhanced rate for sites closest to central London.

The most significant risk of modern slavery within our business is in our group supply chain. In previous statements, we highlighted that we engaged directly with senior representatives from a selection of our major, direct suppliers of PPE to understand how they address modern slavery risk in their international business and supply chain and that we were satisfied by the responses we received from suppliers.

We recognise, however, that this deep dive exercise provided coverage for a limited proportion of our supplier base and therefore during 2022 we formed a working group to commence an evaluation of suitable third-party management systems which can risk assess and monitor the level of performance of our key suppliers across a range of areas including labour and human rights. We completed our initial evaluation exercise in 2023 and it is intended that Spire Healthcare's sustainability committee will review this in 2024.

In 2023, we continued supplier and product rationalisation initiatives, focusing our attention on increasing the proportion of spend with long-standing reputable suppliers, with whom satisfactory due diligence has been carried out, where appropriate.

### **Measuring effectiveness**

In 2023, we maintained a qualitative approach by a) assessing our business for areas most susceptible to the risks of modern slavery and human trafficking, and b) identifying, undertaking and continuously building on appropriate actions that will have the biggest impact on reducing and ultimately eliminating modern slavery from touching our business. We will review the introduction of KPIs in 2024/25, following the possible introduction of a third-party supplier evaluation tool / risk management system and the availability of more relevant data.

### **Policies**

In 2021, our whistleblowing policy was replaced with a broader raising concerns policy to ensure that anyone who works at Spire Healthcare feels informed, empowered and encouraged to raise

any concerns of suspected wrongdoing or harm in our business. The key policies relating to safeguarding adults at risk and the procedure for safeguarding children and young people remain up-to-date and contain specific references to modern slavery risk. In early 2023, the group's procurement policy was updated following a comprehensive review.

## **Training**

Training and raising awareness are absolutely fundamental to ensure all our colleagues understand the importance of this issue, know the practical signs of modern slavery and how to respond. All non-hospital colleagues in central functions are required to complete courses entitled safeguarding children and young people (combined level 1 and 2) and safeguarding adults at risk (combined level 1 and 2) which cover modern slavery as a category of abuse. All Spire Healthcare's registered healthcare professionals are required to complete level 3 safeguarding adults training and all our hospital safeguarding leads receive level 4 safeguarding officer training (which covers relevant local authorities' modern slavery safeguarding protocols and the duty to notify).

We abhor the practice of modern slavery – it cuts right across Spire Healthcare's purpose and the values we live daily. We are committed to continuously developing and strengthening our approach, each year, to make meaningful progress towards eradicating this crime.

This statement has been approved by the board of directors of Spire Healthcare Group plc.

**Justin Ash**

Chief Executive Officer

23 June 2024