

Modern Slavery and Human Trafficking Statement 2020

Circle Health Holdings Limited
BMI Healthcare Limited

Introduction

Circle Health Holdings Limited is the holding company for Circle Health Limited and BMI Healthcare Limited (together referred to as “Circle” or the “Group”), 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. Although the Group’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;
- 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 to engaging new suppliers.

Under our MSP, suppliers providing single-use items (e.g. PPE, clothing, and lower cost consumables) are considered at higher risk, and so we ensure that these suppliers are subject to regular audits and closer monitoring.

Throughout most of 2020, when the Group made its facilities available to the NHS in response to the CV-19 pandemic, the majority of our PPE requirements was sourced through NHS Supply Chain to ensure the quality, standardisation, and sufficient volumes necessary to supply all our hospitals. The Group expects to continue to source PPE from NHS Supply Chain until the current arrangement expires in March 2022.

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.

Circle is in the process of creating a new supplier onboarding system, which will require all suppliers to 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 contacted our leading suppliers based on spend, as well as suppliers identified as higher risk of having modern slavery present in their supply chains, to provide updated assurances of their commitment to mitigating modern slavery and human trafficking. Of the 125 suppliers contacted, 114 have provided responses and the remainder are being followed up to ensure responses are received. 2 suppliers have been flagged with a requirement for further investigation to ensure compliance with Circle's policy.

Policies and Training

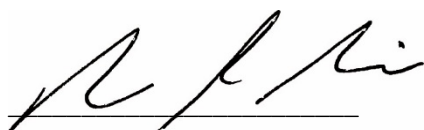
We require our suppliers and our business partners to affirm that they comply with the requirements of the Modern Slavery Act 2015 as part of the formal contracting process. Our standard supplier terms and conditions expressly refer both to the Act and our expectation of transparency by the particular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

In addition to our Modern Slavery Policy, 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 2021