

# Modern Slavery Statement

SpaMedica Ltd is a leading independent provider of cataract surgery and other eye services for NHS and private patients in England, Wales and Northern Ireland. SpaMedica is a limited company registered in England and Wales, registered number 664429. SpaMedica contracts with commissioners of NHS services.

## **POLICY**

SpaMedica prohibits slavery, servitude, forced or compulsory labour and human trafficking in our business, services and supply chain. We will not knowingly deal with any business involved in slavery or human trafficking of any kind. We support ethical business practices and policies to protect workers from any abuse or exploitation in relation to our business and supply chain. Our Anti-Slavery Policy is published to all employees in our policies register.

## **STRUCTURE**

SpaMedica has over 1,600 employees across our 50 hospital sites and Head Office support functions. We also use some specialist sub-contractors and service companies in addition to our regular consumable stock, equipment and drug suppliers. SpaMedica is part of the Veonet Group of healthcare companies.

## **DUE DILIGENCE**

Before contracting with a new supplier, we usually complete due diligence on that organisation. This includes a review of their modern slavery statement on their website and, in some cases, their annual report, modern slavery policies or any relevant media reports.

## **RISK ASSESSMENT**

We are mindful that modern slavery could occur in our own business or UK-based services contractors as well as UK or overseas manufacturers. We periodically categorise all our suppliers into low, medium and high risk and carry out appropriate audit work for the risk level to provide reasonable assurance on our purchases from that supplier.

Risk factors used include:

1. Industry type
2. Nature of workforce
3. Supplier location
4. Context in which supplier operates
5. Commodity type
6. Business/supply chain model

Most of our suppliers send goods to us from within the UK or EU. However, we are aware that many key suppliers will be themselves supplied by manufacturers in much higher risk areas. We are therefore working towards obtaining specific assurance around modern slavery from our high-risk suppliers regarding their own supply chain.

## **EFFECTIVENESS**

We build long standing relationships with our suppliers, based on mutual trust and transparency. We actively encourage the reporting of any wrongdoing and protect whistle-blowers. We encourage colleagues to raise any concerns around modern slavery with their line manager or a member of the People team, or to use the national helpline 08000 121700 or [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org) to report those concerns.

We take a zero-tolerance approach towards slavery and human trafficking and our supplier contracts include clauses to that effect. We will evaluate any instances of non-compliance in our supply chain on a case-by-case basis and may choose to work with suppliers to improve their practices.

**TRAINING**

To ensure all our employees understand the real risks of modern slavery and human trafficking in our business and supply chains, each of our colleagues completes specific mandatory training on induction. From 2023 onwards, this will be refreshed annually for all employees. The Governance Manager and Procurement Manager participate in more detailed Modern Slavery training and share resources from a variety of sources, including the Independent Healthcare Providers Network and the Institute of Chartered Accountants in England and Wales.

**REVIEW**

This statement is reviewed annually, unless circumstances dictate that it should be reviewed more frequently. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022. It was approved by the board of directors on 30 June 2023.

A handwritten signature in black ink, appearing to read 'M Johnson', with a large loop at the end.

**Martin Johnson**

**CFO**

SpaMedica Limited

Date: 30 June 2023