

MODERN SLAVERY STATEMENT

SpaMedica Ltd ("SpaMedica") is a leading independent provider of eyecare services for NHS and private patients in England and Wales. SpaMedica is a limited company registered in England and Wales, registered number 664429. SpaMedica is a member of Veonet, a pan-European group of healthcare companies.

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 that protect workers from abuse or exploitation in relation to our business and supply chain. Our Anti-Slavery Policy is published to all colleagues through our policy management framework.

STRUCTURE

SpaMedica employs approximately 1,600 colleagues across 64 hospital sites, 8 spoke sites, 3 mobile units and a Head Office with support functions throughout England and Wales. We also engage specialist subcontractors and service providers, in addition to our regular suppliers of consumables, medical equipment, pharmaceuticals and other goods and services required to support the delivery of high-quality patient care.

DUE DILIGENCE

SpaMedica undertakes proportionate due diligence as part of its vendor onboarding process. This includes financial and company verification checks, such as validation of company and VAT registration details, verification of supplier bank account information, and other controls designed to support the integrity of the supplier setup process. The organisation continues to strengthen these controls through enhancements to its vendor approval process and evaluates opportunities to introduce additional third-party due diligence where appropriate.

SpaMedica expects its suppliers to operate in accordance with applicable laws, including those relating to modern slavery, and remains committed to continually improving its supplier governance and due diligence arrangements

RISK ASSESSMENT

We are mindful that modern slavery could occur within our own operations, through UK-based service contractors or within UK and overseas manufacturing supply chains. During the year, we identified our major suppliers by spend and categorised them into low, medium and high-risk groups. To date, we do not have any suppliers classified as high risk.

Risk factors considered include:

1. Industry type
2. Nature of workforce
3. Supplier location
4. Context in which the supplier operates
5. Commodity type

6. Business and supply chain model

Most of our suppliers provide goods and services from within the UK or EU. However, we recognise that many key suppliers may themselves source products from higher-risk regions. Where suppliers are identified as presenting an elevated risk, we seek assurance regarding modern slavery controls within their own supply chains as part of our contract management and supplier assurance processes.

EFFECTIVENESS

We build long-standing relationships with our suppliers based on mutual trust, transparency and ethical business practices. We actively encourage the reporting of wrongdoing and protect whistleblowers. Colleagues are encouraged to raise any concerns regarding modern slavery with their line manager, a member of the People Team, or through the Modern Slavery Helpline on 08000 121700 or via www.modernslaveryhelpline.org.

We take a zero-tolerance approach to slavery and human trafficking and, where possible, include appropriate contractual provisions within supplier agreements. Any instances of non-compliance identified within our supply chain will be assessed on a case-by-case basis and may result in corrective actions, enhanced monitoring or termination of the supplier relationship where appropriate.

TRAINING

To ensure colleagues understand the risks of modern slavery and human trafficking within our business and supply chains, all employees complete mandatory training upon induction and annually thereafter. The Compliance & Risk Division and Procurement Team continue to utilise guidance and resources from recognised industry bodies, including the Independent Healthcare Providers Network and the Institute of Chartered Accountants in England and Wales.

REVIEW

This statement is reviewed annually unless circumstances require a more frequent review. This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes SpaMedica's slavery and human trafficking statement for the financial year ending 31 December 2025.

It was approved by the Board of Directors on 23rd June 2026.

Chief Financial Officer
SpaMedica Limited

Date: 23/06/2026

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