Modern Slavery Act 2015 | Statement 2024-2025

Statement by Neville Koopowitz, Vitality Group CEO

"Vitality seeks to ensure that human trafficking and slavery do not form part of our supply chains. We strongly oppose any use of slavery or human trafficking in the provision of our services and promote ethical and lawful business practices within our workplace. Vitality will not tolerate or condone any form of policy or practice that constitutes human trafficking or slavery in any part of our organisation. This policy complies with the UK Modern Slavery Act 2015."

This statement is reviewed and updated on our public website annually. This statement covers our business operations for the year ending 30 June 2025.

About Vitality

Our Business

Companies in the Vitality UK Group are involved in the provision and distribution of private medical insurance and life/protection insurance to members based in the United Kingdom. Our insurance plans are purchased by private individuals, small to medium enterprises and large corporate customers.

Our life and health insurance plans include our wellness programme that helps our members understand their health along with access to tools that support healthy behaviours and rewards them for making healthier lifestyle choices.

Vitality has a broad range of distribution channels which includes direct to consumer, intermediated and online sales. Where we market our products through intermediaries, they are authorised and regulated by the Financial Conduct Authority.

Our values

1. **Great people**
   We attract great people from diverse backgrounds, with distinctive personal experiences and outlooks. We find the best person for every role, maintaining our exceptional standards with every hire.
2. **Liberating the best in our people**
   We believe there is greatness in every person and intervene to bring this out of

them. We insist on an inclusive environment, enabling everyone to be themselves.

3. **Intellectual leadership**
   We're thought leaders in the markets we operate in. We actively engage in policy debate based on science and facts, inspired by our core purpose. We're committed to continuous learning and self-development.
4. **Force for good**
   Our goal is to be an exceptional employer, excellent partner and a good corporate citizen. We are also committed to nation building and protecting our planet.
5. **Customer, customer, customer**
   We are all about our customers and their experiences with us. We empathise as though their problems are our own and recognise the impact of our actions on the people we serve. Every interaction matters, and we articulate this care through intuitive customer journeys. Anecdotes matter. We use every customer touchpoint to nurture lifelong relationships.
6. **Innovation and optimism**
   We are a profound disruptor. We enter markets where we believe that through our core purpose and shared-value model, we can effect change for good. We do so through products that are brilliant - they deal with complex issues yet, should be simple to understand.
7. **Drive, tenacity and urgency**
   We think like founders. We despise unnecessary bureaucracy and irrespective of our scale – we seek insurgency. We execute brilliantly, and at rapid pace, marrying our ambitions with short-term, urgent goals.
8. **Business astuteness and prudence**
   We think like owners. We pursue the business case and invest only if there is a clear benefit for the organisation, our customers and society. We embrace necessary governance in substance and form. We pursue exceptional risk management, financial excellence and financial strength. We face challenges constructively and head-on.
9. **Integrity, honesty and fairness**
   We ensure we contrast the complexity of the organisation with simple, old-fashioned values of doing the right thing. We are truthful in our interactions and transparent in all of our dealings. We ensure that every single rule and policy meets the highest ethical standards. We treat everyone fairly, recognising the inherent worth of every human being.

Our company structure

The Vitality UK Group consists of the following companies:

- Discovery Holdings Europe Limited
- Vitality Corporate Services Limited
- Vitality Health Limited
- Vitality Life Limited
- Vitality Health Insurance Limited
- Vitality Healthy Workplace Limited

These firms are owned by the Discovery Group which is based in South Africa.

We employ 2,600 employees across a number of locations in the United Kingdom and our primary offices are in Bournemouth, London and Stockport. The Group turnover is more than £1.1bn and we insure more than 1.85 million customers.

Recruitment

We have in place robust recruitment and screening processes for new employees to ensure that we do not inadvertently employ anyone who might fall within the scope of the Act. Our recruitment processes comply with UK employment and regulatory laws. We ensure that new recruits are eligible to work in the UK and we carry out due diligence and background checks. All employees are provided with an employment contract, and we periodically benchmark our salaries and benefits to ensure they remain competitive.

Our supply chains

Vitality third-party suppliers are an important part of our success and our culture. We expect each business partner to conduct their business with the same commitment to ethical business practices as Vitality. This means our third-party suppliers must:

- Not use slave labour, illegal child labour or forced labour
- Ensure that the overall terms of employment are voluntary
- Follow all local employment laws regarding minimum age requirements, wages, overtime benefits and the number of hours worked in a seven-day week
- From time to time certify that they conform to the expectations above
- Be able to demonstrate compliance with our policies at the request and satisfaction of Vitality.

Vitality will maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and human trafficking. Vitality will promptly and thoroughly investigate any claim or indication that a third-party supplier is engaging in human trafficking or slave labour. If any third-party supplier is found in violation of this policy, Vitality will take prompt, remedial action to address the violation.

Vitality will provide ongoing training to relevant employees on the law and Vitality's approach to human trafficking and slavery.

Given the nature of our business, our board and management teams believe there is an extremely low likelihood of there being any involvement in slavery or human trafficking either within our group or within the supply chains that we use to deliver services to our customers. We have limited exposure to high-risk sectors or geographical areas. Our supply chains are limited and include:

- Firms that provide IT support and "back office" functions, such as invoice processing and plan administration
- Our parent company – Discovery in South Africa
- Business partners who support our Vitality Programme
- Hospital partners who provide clinical services to our customers
- Software providers of "Software as a Service" solutions
- Professional Services providers – this would cover everything from architects, through to business consultants and legal services.

Our policies on slavery and human trafficking

We have a People Policy and an Equality, Diversity and Inclusion Policy that promote a workplace environment that is respectful, fair, open, and inclusive.

We have a Whistleblowing Policy that enables our employees to raise concerns about malpractice in the business.

We also have a third-party supplier Code of Conduct that outlines the expectations we have in areas such as:

- Employment Standards (which includes Freedom of Association, Diversity and Equality, Pay and Benefits, Working Hours, Forced or Involuntary Labour and Child Labour)
- Competition and Anti-trust

- Health, safety and the environment
- Bribery and corruption
- Financial Crime.

Due diligence processes for slavery and human trafficking

As part of our Third-Party Risk Management process, we will evaluate any potential slavery and human trafficking risk presented by new and existing third-party suppliers and their supply chains. We have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Include specific contract clauses on modern slavery where required
- Evaluate the risk of slavery and human trafficking occurring in our supply chains and take remediation action where necessary
- Monitor potential risk areas in our supply chains
- Protect whistle blowers.

Third-Party Suppliers adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have a third-party supplier monitoring programme that involves periodic reviews of our suppliers. All our key suppliers will be subject to bespoke relationship management arrangements. During the period from July 2024 to June 2025, no instances of Modern Slavery were identified.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to staff involved in the procurement of goods and services.

Further steps

We will continue to monitor our third-party suppliers base and to further develop our processes and procedures to ensure that we identify and eliminate risks related to slavery and human trafficking.

We will continue to enhance the training that we provide to relevant staff.

We are continuing to review the way we do business with third parties through our corporate sustainability strategy. This involves a deeper exploration into the

environmental and social standard our third-party suppliers work within and the governance that oversees them.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30 June 2025.