

# Modern Slavery and Human Trafficking Statement

## Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The Group has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high ethical standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes. As we progress, we will embed controls and due diligence to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, and business partners.

We understand our responsibilities for Environmental, Social and Governance (ESG) criterion; as we progress and develop our work, we are committed to this informing how we intend to operate.

## Statement

### 1. Introduction

This statement is made pursuant to Section 54(6) of the Modern Slavery Act 2015 and sets out our actions to understand all potential modern slavery risks related to our businesses and to put steps in place aimed at ensuring that there is no slavery or human trafficking within our own businesses and supply chains. This statement relates to actions and activities during the financial year ended 31 December 2021.

### 2. The Business

This statement covers the activities of the following UK entities in the Vanguard Group ("Group"):

- Vanguard Healthcare Solutions Limited
- Armada Midco Limited
- Project Darwin Topco Limited
- Vanguard Healthcare Group Limited
- Armada Topco Limited
- Armada Bidco Limited
- Project Darwin Bidco Limited

The Group has been providing flexible clinical infrastructure for over 20 years, including equipment, staff and ancillary services to both the public and private healthcare sectors in the UK and overseas. The group has locations in the UK, Netherlands and Australia, and set up a new Swedish presence shortly after the year end. For 2021 we had an average of 102 employees but, as an organisation rely heavily on agency workers and contractors.

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### 3. The Supply Chain, Employees and Workers

The supply chain involved in the running of and the design, manufacture and installation of our flexible clinical structure, and the subsequent provision of staffing and equipment is complex and involves multiple levels and different sized organisations. All our suppliers are either based in UK, Europe or Australia. We will use our direct suppliers to manage the risks of modern slavery and human trafficking throughout the entire supply chain and clearly communicate the expectations and requirements the Group has down through the supply chain. We have achieved accreditation to the Considerate Constructors Scheme and adherence to the Act is a key requirement of the scheme.

We operate employment policies and procedures that are designed to treat all individuals who work within our business with dignity and respect, to reward them fairly for their work and not to exploit them. This applies to engagements with agency workers and contractors. Annual reviews are undertaken to assess that pay levels remain sufficiently in excess of national living wage. We undertake appropriate pre-employment checks on all our employees and require all agencies we use to do the same and uphold professional codes of conduct for all our qualified employees and workers. Employees and workers are encouraged to report any concerns in line with our Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy.

Our participation on NHS supply frameworks and our ongoing work with NHS bodies requires the Group to provide regular assurance on a wide range of compliance measures, including the policy and measures we take to combat modern slavery and human trafficking.

We have carried out a high-level assessment of our supply chains and the potential for slavery and human trafficking. As most of our suppliers are based in the UK, western Europe and Australia, and many are operating in specialised rather than low skilled industries, our supply chains have been assessed overall as posing a low risk in terms of non-compliance with the Act.

We only wish to work with organisations in our supply chains that have commitments in line with the Group and are not involved in modern slavery, or human trafficking. While it is the obligation of those organisations to operate their own policies and procedures to achieve that objective, we will develop and build upon our existing practices to ensure we take all reasonable steps to verify compliance by all material direct suppliers with the Act.

### 4. Improvement plans

- To continue to re-assess the risks posed to the business in connection with the Act
- Review the procurement process, develop a supplier code of conduct, and incorporate the requirement for a commitment to our modern slavery policy prior to any appointment of new suppliers
- Obtain assurance from existing material suppliers in relation to their continued compliance with the Act, by requesting them to sign and accept the supplier code of conduct
- To develop an ESG strategy for the business which will include compliance with the key principles of the Act
- To introduce an overview of the Act and its principles in the employee induction programme for all new starters
- To introduce and deliver targeted training sessions to staff procuring goods and services
- To continually review the provisions of the Act as applicable to our business activities

This statement has been approved by the Board of Directors on 24 June 2022, who will review and update it on an annual basis.

**David Cole**  
**CEO**  
**27 June 2022**

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