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. We will act ethically and with integrity in all our business dealings and relationships, implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our Group or our supply chains. We understand slavery and human trafficking are often used collectively.

> *Someone is in slavery if they are:*
> *- forced to work – through coercion, or mental or physical threat owned or controlled by an 'employer', through mental or physical abuse or the threat of abuse dehumanised, treated as a commodity or bought and sold as 'property', physically constrained or have restrictions placed on their freedom of movement.*
>
> *- Human trafficking involves recruitment, harbouring or transporting people into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will.*[1]

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

Our Supply Chain and People

We expect the same high ethical standards from all our contractors, suppliers and other business partners. As part of our contracting process these standards and requirements form part of our agreement with our subcontractors.

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

We work closely in partnership with our suppliers in the UK and internationally, which allows us to identify any potential risks of non-compliance.

Governance

We have developed our governance and internal controls to identify concerns or risks about the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own supply chain to the same high standards. Assurance is provided through our governance structure.

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

[1] Slavery in the UK, Anti-Slavery International (2019)

supply chains. This statement relates to actions and activities during the financial year ended 31 December 2022.

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 Bidco Limited
- Armada Topco Limited
- Armada 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, Sweden and Australia. For 2022 we had an average of 141 employees but, as an organisation rely heavily on agency workers and contractors.

3. The Supply Chain and our People

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. It 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. We will clearly communicate the expectations and requirements the Group has, cascading this through the supply chain.

We operate employment policies and procedures that are designed to treat all individuals who work within our business with dignity and respect. We 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. We require all employment agencies to do the same and our People team seek an assurance this has been undertaken. We uphold professional codes of conduct for all our qualified employees and workers.

As we develop we want to ensure we maintain the right culture across the Group. Employees and workers are encouraged to report any concerns in line with our Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy. We are now taking this further and this year we are establishing the principles of a *Just Culture*, ensuring a safe environment where individuals trust they can and should, report concerns without blame. When errors are reported they will be explored organisationally as a learning opportunity and inform part of our continuous improvement and ISO9001.

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 will only work with organisations in our supply chain 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 monitor through our contract management and build our existing practices to ensure we take all reasonable steps to verify compliance with the Act.

4. Actions taken in the last 12 months

- We have developed our governance structure, implementing internal controls frameworks to

mitigate associated risks, and updated our policies.
- We have updated our ESG strategy, which informs how we operate and will provide a framework to give us assurance on our supply chain.
- We have introduced an overview of the Act and its principles in the employee induction programme for all new starters.

5. Improvement plans

- Proactive management of risks in connection with the Act through our governance structure to Board level.
- Establish a procurement function to be tasked to develop a supplier code of conduct and to oversee compliance with the Act for new suppliers to undertake the necessary due diligence checks.
- Obtain assurance from existing material suppliers in relation to their continued compliance with the Act, by requesting them to sign and accept the new supplier code of conduct.
- Obtain assurance from existing suppliers, proportionate to the risk, on their ESG credentials in line with our strategy to include compliance with the key principles of the Act.
- Implement a *Just Culture* so colleagues feel supported and able to raise any concerns they might have.
- Continuous improvement forms part of our reformed governance structure providing an opportunity to mitigate risks associated with non-compliance with the Act or poor practise in our supply chain.
- 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 30 June 2023, who will review and update it on an annual basis.

Chris Blackwell-Frost
CEO
30 June 2023