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.

<u>Our Supply Chain and People</u>

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.

<u>Governance</u>

We continually develop 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 have established controls to hold the supply chain to the same high standards. We are aware of the risks and have controls to manage them and 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 controls

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

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 2023.

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
- Vanguard Healthcare Solutions (Modular) 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 2023 we had an average of 141 employees but, as an organisation we are reliant 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 have communicated our expectations and requirements on the standards to become one of our approved suppliers to our Group, 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 do not 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 have undertaken Human Factors training across the Group. We continue to build our *Just Culture*, ensuring a safe environment where individuals trust they can and should, report concerns without blame. We have appointed a Health, Safety and Environment Manager for our Group, who is responsible for ensuring the right work culture is maintained. Our governance structure means lessons learnt or errors are reported organisationally and followed up, informing our continuous improvement and ISO9001.

We have introduced a pre-qualification process for our supply chain which assesses our supply chains and the potential risks for slavery, child labour 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. However, the risks to our supply chain are monitored and we do update our pre-qualification process as necessary.

We will only work with organisations in our supply chain that have commitments in line with the Group and can provide assurance they 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 monitor through our pre-qualification process, contract management and 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**:**

- Appointed a Head of Procurement and Supply Chain
- Appointed a Health, Safety and Environmental Manager.
- Delivered Human Factors training.
- Introduced an electronic pre-qualification questionnaire for our suppliers.
- Reviewed the risks and mitigations relating to our supply chain.
- Undertaken a review of our Supply Chain to ensure compliance with the Act.
- Undertaken an independent review of our ESG credentials across our Group, implementing recommendations so we improve.
- Implemented our supplier standards through our supply chain, for existing suppliers and new suppliers.
- Continually assess the effectiveness of our governance structure and made amendments to ensure controls are in place to comply with the Act.
- Continued to raise awareness on the Act and associated risks as part of our induction process.

5. Improvement plans

We will be:

- Progressing our corporate Environmental, Social and Governance (ESG) commitment throughout our Group.
- Reviewing our supply chain as a minimum annually, or when the risk is identified as part of our supply chain management
- Updating our governance to ensure ESG targets are delivered and monitored
- Undertake a Modern Slavery Risk Assessment with our agencies and critical suppliers.
- Maintain our supplier standard to ensure it meets our ESG and Social Value ambitions.
- Monitoring the requirements of the NHS supplier standard requirements so we meet them, but our ambition continues to be to exceed them.
- Sourcing an external company to facilitate 'Whistleblowing' to further create an open and transparent corporate culture.
- Continuing to implement, develop and promote across the Group a *Just Culture* creating more routes and opportunities to feedback or raise concerns.
- Enabling our governance structure so it supports continuous improvement to mitigate risks associated with non-compliance with the Act or poor practise in our supply chain.
- Improving Group awareness on compliance with the Act, including bribery and corruption and child labour.
- Establishing controls and a culture to encourage action to mitigate risks of non-compliance with the Act across our Group.
- Continually review the provisions of the Act as applicable to our business activities.

This statement has been approved by the Board of Directors on 27 June June 2024, who will review and update it on an annual basis.

Chris Blackwell-Frost
CEO
27 June 2024