

The Nazareth Trust's Statement on Modern Slavery

This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out the approach taken by TNT (TNT) to understand all potential modern slavery risks related to its business, and the actions undertaken to mitigate any such risks during the financial year ended 31 December 2025.

OUR ORGANISATION

TNT is a charity which provides Healthcare, Education and Biblical Teaching and Christian Volunteer Service. All our charitable operations are based in Nazareth, Israel, and comprise of the following: Nazareth Hospital, Academic School of Nursing, Serve Nazareth, and the Nazareth Village. We employ around 900 staff in Israel: the majority of which are healthcare professionals and are employed at the hospital.

TNT Head Office is based in Edinburgh, Scotland, where a small team is employed.

TNT's operations in Israel have a number of goods suppliers and service providers, all of whom operate within Israel. Our suppliers are predominantly healthcare related e.g. hospital equipment, pharmaceutical products, and a small number of service providers include cleaning and security.

OUR POLICY ON PREVENTING SLAVERY AND HUMAN TRAFFICKING

The Board aims for the highest ethical and professional standards and always seeks to comply with UK laws pertinent to all of our operations at home and abroad, as well as all local laws and regulations applicable to our operations. It follows that TNT is absolutely committed to preventing slavery and human trafficking in all its activities. This commitment is emphasised in our company policies. We also expect the same high standards which we set for ourselves from those parties with whom we engage, such as our suppliers and all those who access our services.

Due to the nature of our charitable work, predominantly in the Health or Education sectors, we assess that there is a low risk of slavery and human trafficking within TNT. However, we aim to periodically review the relevant policies and procedures that we have in place. As any instance would be expected to be a breach of law, we do not have key performance indicators in relation to slavery or human trafficking.

We are also committed to preventing modern slavery or human trafficking in our supply chains or in any part of our work. While we do not directly control or supervise the day to day practices of all suppliers, we do take reasonable and proportionate steps to prevent the risk of non compliance with applicable modern slavery legislation

These steps include undertaking appropriate due diligence when engaging suppliers, seeking contractual commitments where appropriate, and communicating our expectations that suppliers operate in accordance with applicable laws and ethical labour standards. We will continue to review and improve our processes to identify and mitigate risks within our supply chain

Staff in Israel are employed according to strict Israel Employment Legislation, and they are not in any category which is generally seen to be vulnerable to modern slavery in Israel. Therefore, our primary focus is to ensure that there are policies in place which address our contractors and suppliers.

STAFF TRAINING

TNT has comprehensive recruitment processes and procedures in place. All staff undergo ID checks confirming eligibility to work in Israel to safeguard against human trafficking or forced. All staff have Terms

and Conditions which are regularly reviewed in line with Israel employment law, collective agreement and best practice.

TNT seeks to ensure that all employees understand and comply with high ethical standards and all staff undergo induction training prior to confirmation in employment to support their understanding of ethical issues, nurture compliance with all laws and ensure compliance with core topics such as TNT's Code of Conduct, Safeguarding, Grievance and Whistleblowing Policies.

TNT has a comprehensive Whistleblowing Policy which encourages all our employees to speak out if they have concerns about any activity, breach of law, breach of our Code of Conduct, dangers to the public and any concealment of information. Our policy is designed to make it easy for all colleagues to speak up and report anonymously without any risk to their employment or suffering any form of retribution.

We recognise that the welfare of all of those who access our services is paramount in all circumstances regardless of legally protected characteristic. We also recognise that people of these protected characteristics are particularly vulnerable to abuse and we accept responsibility to take reasonable steps to ensure their welfare through adherence to our Safeguarding Policy.

In addition to these, a specific Modern Slavery & Human Trafficking Policy has been written to further support staff and all those associated with TNT in identifying and managing risk in this matter. As with other key policies, explanation and compliance with this policy forms a crucial part in the induction and training of all staff.

DUE DILIGENCE

As part of the Board's objectives to identify and mitigate risk, TNT engages an independent internal auditor to audit various aspects of our activities. very year, the independent auditor assesses a specific part of our business, and subsequently provides the Board and management with a report and recommendations. The aim of the audit is examine TNT's risk management, governance and internal control processes.

Regarding our supply chains, the internal auditor is tasked with identification and assessment of potential risk areas, and with ensuring that sub-contracted employees are being employed according to Israel's stringent employment legislation e.g. eligibility to work, minimum wage requirements, vaccinations etc.

MONITORING AND RISK MANAGEMENT

This statement will be reviewed once annually, or in the following circumstances:

- changes in legislation and/or government guidance;
- as required by the Scottish Charity Regulator;
- as a result of any other significant change or event.

Trustees routinely review the organisational Risk Register which has a dedicated section on preventing modern slavery.