

Modern Slavery Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**) and sets out the steps taken by Spire Healthcare Group plc, and other relevant group companies¹ (**Spire Healthcare**), in preventing modern slavery and human trafficking in its business and supply chains. This statement covers the calendar year 2022 (also Spire's financial year).

Our Structure, Business and Supply Chains

Spire Healthcare is one of Britain's largest independent healthcare companies, operating across England, Wales and Scotland. During 2022, working in close partnership with NHS trusts and around 8,760 experienced consultants, our hospitals and clinics delivered personalised care to c.926,500 insured, self-pay and NHS patients across England, Wales and Scotland. Spire Healthcare Group plc is a public company quoted on the London Stock Exchange (SPI: LSE) and its registered office is 3 Dorset Rise, London EC4Y 8EN. You can read more about the business in our latest Annual Report.

At the heart of Spire Healthcare is our updated Purpose to '*make a positive difference to people's lives through outstanding personalised care*'. This underpins everything we do. We strive to deliver our purpose by living our six values, which include: '*Doing the right thing*' and '*Caring is our passion*'. These values, in particular, demonstrate our people-focused approach and commitment to act ethically and with integrity in all our relationships.

Our cross-department working group oversees modern slavery risk in the business. The group includes senior representatives from Spire Healthcare's Legal, People, Procurement, Operations, Internal Audit and Risk functions.

As a national, multi-site organisation, we buy a wide range of goods and services, from surgical equipment, consumables and medicines, through to laundry, clothing and waste disposal. Some of these products and services are used in the provision of healthcare to patients, such as joint prostheses, whilst others will be used in day-to-day business operations, such as office supplies. We engage thousands of suppliers across Spire Healthcare, making our end-to-end supply chains extensive and complex. However, 80% of total spend is concentrated with c.230 suppliers. At tier-one (direct) level 98.6% of our suppliers are UK-based businesses. However, to date we have limited visibility at tier-two level and above. While we recognise that UK-based

¹ This statement relates only to Spire Healthcare Group plc and Spire Healthcare Limited, which are the only group companies to fall within the scope of the Act

businesses are not free from susceptibility to modern slavery practices, we acknowledge that it is often in the remote parts of a long global supply chains where there is heightened risk.

Spire Healthcare's standard terms and conditions require Suppliers to adhere to stringent warranties, representations and undertakings, including a commitment to conduct regular training for all affiliates, officers, employees, agents, subcontractors, to drive transparency to eliminate modern slavery across our supply chain.

Due Diligence Processes

In 2022, we maintained our modern slavery due diligence process for all material new suppliers (those with an annual spend in excess of £1m), whereby if any such supplier is deemed medium or high risk based on internally developed scoping criteria then they would be further risk assessed through a detailed modern slavery questionnaire. There were no issues identified via this process. If an issue were to arise then, on a case-by-case basis, we would first seek to address this by working with any supplier where there is realistic prospect of remedy/reform. However, we would not hesitate to immediately cease dealings with a supplier, or engage with alternative suppliers, if necessary.

Risk Assessment and Management

We recognise that, whilst we are a UK-based business, modern slavery is a complex, global issue which affects the healthcare sector. The two principal areas of focus in our business are at front-line level, in safeguarding patients (and anyone else who comes through our facilities), and in our supply chain.

In terms of our business operations, we believe practitioners and our staff are well placed to identify and deal with modern slavery through the training and protections in place to protect patients. The safeguarding system trains those practitioners and other colleagues (clinical and non-clinical) to recognise and report signs of abuse. We believe the rigour of this system materially mitigates the risk of modern slavery from either going undetected or being inadequately dealt with at front-line level. The front-line risk is further controlled by the support, training and infrastructure in place for all colleagues to be able to raise concerns, through our network of local 'Freedom to Speak Up Guardians', central concerns e-mail and, if necessary, via a confidential external helpline.

Under Spire Healthcare's Procurement Policy, which was updated in early 2023, our hospitals and clinics are equipped with guidance and a risk assessment tool for evaluating modern slavery

risks in local contracts. The vast majority of people who run our business are employed and must satisfy all necessary employment checks for their role. We have also increased our minimum hourly rate above the national living wage, with an enhanced rate for sites closest to central London.

The most significant risk of modern slavery within our business is in our group supply chain. In our 2021 statement, we highlighted that we engaged directly with senior representatives from a selection of our major, direct suppliers of PPE to understand how they address modern slavery risk in their international business and supply chain and that we were satisfied by the responses we received from suppliers.

We recognise, however, that this deep dive exercise provided coverage for a limited proportion of our supplier base and therefore during 2022 we formed a working group to commence an evaluation of suitable third-party management systems which can risk assess and monitor the level of performance of our key suppliers across a range of areas including labour and human rights. We have made good progress and our evaluation process is nearing conclusion, following which a recommendation will be submitted for consideration during 2023.

In 2022, we continued supplier and product rationalisation initiatives, focussing our attention on increasing the proportion of spend with longstanding reputable suppliers, with whom satisfactory due diligence has been carried out, where appropriate.

Measuring Effectiveness

In 2022, we maintained a qualitative approach by a) assessing our business for areas most susceptible to the risks of modern slavery and human trafficking, and b) identifying, undertaking and continuously building on appropriate actions that will have the biggest impact on reducing and ultimately eliminating modern slavery from touching our business. We will review the introduction of KPIs in 2023, following the possible introduction of a third-party supplier evaluation tool / risk management system and the availability of more relevant data.

Policies

In 2021, our Whistleblowing Policy was replaced with a broader Raising Concerns Policy to ensure that anyone who works at Spire Healthcare feels informed, empowered and encouraged to raise any concerns of suspected wrongdoing or harm in our business. The key policies relating to Safeguarding Adults at Risk and the Procedure for Safeguarding Children & Young People

remain up-to-date and contain specific references to modern slavery risk. In early 2023, the group's Procurement Policy was updated following a comprehensive review.

Training

Training and raising awareness are absolutely fundamental to ensure all our colleagues understand the importance of this issue, know the practical signs of modern slavery and how to respond. All non-hospital colleagues in central functions are required to complete Safeguarding Children & Young People (Combined Level 1 & 2) and Safeguarding Adults at Risk (Combined Level 1 & 2) which cover modern slavery as a category of abuse. All Spire's registered healthcare professionals are required to complete Level 3 Safeguarding Adults training and all our hospital Safeguarding Leads receive Level 4 Safeguarding Officer Training (which covers relevant local authorities' modern slavery safeguarding protocols and the duty to notify).

For the fourth successive year, on National Anti-Slavery Day in October, we raised awareness of modern slavery risk, across Spire Healthcare on our employee app Ryalto. In 2022, we continued to develop and roll out our training programme to raise awareness on modern slavery risks including it as a standing agenda item on our Registered Managers' training day.

We abhor the practice of modern slavery – it cuts right across Spire Healthcare's Purpose and the Values we live daily. We are committed to continuously developing and strengthening our approach, each year, to make meaningful progress towards eradicating this crime.

This statement has been approved by the Board of Directors of Spire Healthcare Group plc.

A handwritten signature in black ink, appearing to read 'JA AL'.

Justin Ash

Chief Executive Officer

27 June 2023