

Modern Slavery Statement for the 2025 Financial Year

This statement is made pursuant to Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 (the “Act”) and sets out the steps we are taking to ensure that slavery and human trafficking are not taking place in our supply chain or elsewhere in our organisation.

Our organisation and structure

Nuffield Health is a registered charity and company limited by guarantee providing connected health and wellbeing services to businesses and individuals across England, Scotland and Wales. Driven by our charitable purpose to build a healthier nation, our experts have been working together for more than 65 years to make the nation fitter, healthier, happier and stronger.

In 2025, we had an annual turnover in excess of £1.5 billion. Our head office and registered office are located at Epsom Gateway, Ashley Avenue, Epsom, Surrey KT18 5AL.

Policies and commitments: our approach

The wellbeing of people is central to Nuffield Health’s activities, and we are committed to ensuring an environment in which individual fundamental human rights and freedoms are respected.

In line with our values and our commitment to acting ethically and with integrity, the prevention, detection and reporting of modern slavery and human trafficking is the responsibility of all individuals working for Nuffield Health and associated organisations. This commitment is supported by internal policies including our Code of Conduct, Safeguarding Policy, Whistleblowing Policy and Procurement & Ethical Sourcing standards. Mandatory training further reinforces this awareness.

We promote a culture in which colleagues, suppliers or others can raise concerns confidentially and without fear of retaliation. Our whistleblowing arrangements, including a protected reporting line and SafeCall anonymous hotline, support safe reporting of potential modern slavery concerns.

Further information on ethical expectations can be found in our Supplier Code of Conduct.

[Procurement Supplier Code of Conduct](#)

Our supply chain

Our supply chain includes, but is not limited to clinical supplies, marketing, technology, utilities, pharmaceuticals, textiles, support services, consulting and professional services.

We procure goods and services from a carefully selected group of predominantly domestic suppliers. We do not simply buy goods or services solely based on cost. As part of our regulated tendering process, suppliers must complete a dedicated Modern Slavery section to be eligible for contract award. Contracts include legal requirements relating to compliance with modern slavery, business ethics and anti-bribery laws.

We acknowledge that some categories such as textiles, temporary labour, PPE, and certain international product routes present higher risk. We categorise suppliers based on the nature of goods and services, industry characteristics, and country of operation. Higher-risk suppliers may undergo enhanced due diligence, which may include review of their own Modern Slavery Statements or additional documentation.

We continue to request Modern Slavery statements from suppliers. Suppliers that do not respond or fail to meet requirements are escalated for further review. If, following additional due diligence and checks, a supplier continues to present a significant modern slavery risk or fails to meet our minimum standards, this will be treated as non-compliance.

Non-compliance

If a supplier is found to be non-compliant with our policies or contractual requirements relating to modern slavery, or provides inadequate information, we will, depending on the circumstances, either cease trading immediately or initiate contractual termination processes.

Based on our supply chain due diligence for the financial year ended 31 December 2025, we are satisfied that our key suppliers have appropriate anti-slavery measures in place.

Embedding the Principles of the Act

Over the past seven years, Nuffield Health has taken the following steps to ensure compliance with the Act:

- Introduced mandatory modern slavery training for all employees.
- Ensured modern slavery risks remain a core consideration within procurement activity.
- Updated contractual terms to reference the Act and require supplier compliance.
- Delivered targeted training for staff procuring goods and services.
- Assessed and evaluated modern slavery risks across the supply chain.

We continue to strengthen these efforts through further use of whistleblowing mechanisms, FTSU protections, and reporting channels to support safe raising of concerns.

Our ongoing commitments for 2026

In the coming year, Nuffield Health will:

- Continue to strengthen awareness of the Act across our people and ensure clarity on reporting mechanisms for suspected instances of exploitation.
- Develop further measures, including a specific anti-slavery policy, to reinforce our commitments under the Act.
- Continue to review and enhance procurement processes and policies to consider a broad range of risks, including slavery and human trafficking.
- Maintain ongoing supplier engagement through annual Modern Slavery Statement requests, updated contract requirements, and continuous risk assessments, while expanding our Modern Slavery compliance beyond strategic suppliers to a wider supplier base.

Approval

This statement has been approved by Nuffield Health's Board of Governors.



Dr Natalie-Jane Macdonald, Chair of Governors