



Modern Slavery and Human Trafficking Statement, issued pursuant to Section 54(1) of the Modern Slavery Act 2015

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain, by our business partners or in any part of our business. We take a zero-tolerance approach to any suspected or actual violations. NPH Group will not support or deal with any business knowingly involved in slavery or human trafficking. NPH Group’s directors and senior management shall take responsibility for implementing this statement and its objectives and shall provide adequate resources and investment to ensure slavery and human trafficking is not taking place within the organisation or within our supply chain.

Scope, Business Structure and Supply Chain

This statement is applicable to all businesses within NPH Group and its partners. This statement applies to all ‘workers’ – be that employees, directors, contractors, consultants, home workers, officers, casual workers, and agency workers. NPH Group provides a wide range of services, including occupational health services. We currently employ 25+ staff across the UK. The nature of work undertaken by our supply chain varies throughout the Group. The services provided by our suppliers include (but are not limited to), rehabilitation, diagnostics, occupational health, and wellbeing assessments.

Policies on Modern Slavery, Governance & Training:

We recognise that we all have a responsibility to mitigate and be alert to the risks of slavery, servitude and forced or compulsory labour within our businesses and our supply chain. As a result, our internal documents hold the following controls to reflect our commitment to acting with integrity and to ensure that any potential risks concerning modern slavery are identified:

Recruitment Policy:

Our policy stipulates that proof of eligibility to work in the UK must be sought at the interview. All offers of employment are conditional and are subject to the outcome of the pre-employment screening process.

We reserve the right to withdraw any pending offer of employment in the event of an unsatisfactory outcome.

Diversity & Inclusion Policy:

Our policy has been implemented to ensure the fair treatment of all individuals. All persons working for the business have the right to be treated with dignity and respect. All those who act on the Organisation's behalf will be informed of this policy and will be expected to adhere to it when conducting business on the Organisation's behalf.

Pay Policy:

As an employer, we aim to pay fairly and competitively. We will pay at least the national minimum wage to all our employees.

Code of Business Ethics:

The Code applies across the Organisation and to all our employees & business partners (including but not limited to customers, suppliers, and contractors). All to whom the Code applies are required as a minimum standard to comply with all laws and regulations, including the Modern Slavery Act 2015. NPH Group strives to

maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain. We expect and encourage employees and business partners to bring promptly to management's attention any suspected or actual breaches of our Code. NPH Group also strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

NPH Group's Code makes clear to employees the actions and behaviours expected of them when representing the organisation. Disregard or breach (actual or suspected) of the Code by an employee may result in disciplinary action. NPH Group reserves the right to hold business partners responsible should practices occur in their businesses which are not in line with the principles as embodied in the Code. Disregard or breach (actual or suspected) of the Code by a business partner may result in the termination of the contract. Training on this policy is provided to staff periodically.

Whistleblowing Policy:

This policy ensures all our employees know that they can raise concerns about how colleagues are being treated or about practices within our business or supply chain without fear of detriment.

Due Diligence Processes:

Our contractual agreements provide our suppliers with obligations to adhere to the Modern Slavery Act 2015 and with many of our suppliers, we reserve the right to audit.

As indicated above, as part of our Supplier Management Process, due diligence undertaken of suppliers will incorporate a review of the controls undertaken by the supplier surrounding human trafficking, slavery, and servitude. Those initial diligence questions should NPH Group deem there may be a risk, further specific questions may be asked including (but not limited to) questions on pay, employment practices and contracts.

Risk Assessment:

Based upon the services we provide; we have deemed that the risk of slavery within our business is low. As outlined above, NPH Group have several policies which enable us to mitigate to risk of slavery within our business, and we shall continue to ensure that the risk remains minimal.

With our suppliers, many of our suppliers are deemed to be low-risk as they provide services within low-risk sectors and are based in the UK. However, NPH Group intend to undertake a risk assessment of our suppliers, based upon factors such as their employment practices, location, industry sector and our reliance on this supplier as a business, as our supplier management framework matures. We intend that all suppliers will be categorised and set against the above criteria.

NPH Group recognises that imported goods from sources outside of the UK and EU are potentially more susceptible to slavery & human trafficking risks. The level of management control required for these sources is monitored.

NPH Group will continually review the risk of slavery within our business and supply chain and make any necessary changes to our practices if required.

Monitoring:

Risks and incidents relating to Modern Slavery are monitored by exception through existing controls within the Whistleblowing Policy, Supplier Management Framework & Code of Business Ethics. Any Modern Slavery risks and issues will be escalated the reviewed as part of the Modern Slavery risk assessment.

Training for Staff:

All associated policies are available on the NPH Group intranet, are reviewed periodically and all staff must adhere to these policies.

This statement will be reviewed annually and published. A full copy of this statement and a link to the Modern Slavery Act 2015 will be accessible to all employees on the Intranet and is published on the government's modern slavery registry.

The Legal and Compliance department are registered with 'Stronger Together' and will periodically review their training materials and resources to assess the risk to our Group and roll out training when appropriate.

This Modern Slavery Statement has been approved by the Board of Directors of Newcastle Premier Health Limited on 21st March 2024.

Signed on behalf of NPH Group

A handwritten signature in black ink, appearing to be 'M Philpott', with a horizontal line extending to the right.

Mark Philpott (CEO)

Next review: March 2025