

Modern Slavery Statement 2017

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 (the 'Act') and sets out the steps we are taking to ensure that slavery and human trafficking is not taking place in our supply chain or elsewhere in our organisation.

Our organisation

Nuffield Health is a registered charity and company limited by guarantee providing connected health and wellbeing services to businesses and individuals in England, Scotland and Wales. We have an annual turnover in excess of £700 million and our head office is located in Epsom, Surrey.

Our approach

The wellbeing of people is central to Nuffield Health's activities. A day-to-day life and working environment in which individual fundamental rights and freedoms are respected is fundamental to this.

In accordance with our values and our overarching commitment to acting ethically and with integrity in all our relationships, the prevention, detection and reporting of modern slavery and human trafficking is the responsibility of all those working for Nuffield Health and any associated organisations.

We embrace a diverse and safe workplace environment in which equal opportunity and fairness are paramount. Equally, Nuffield Health supports and complies with the provisions of the Modern Slavery Act 2015 (the 'Act') and our organisational policies incorporate relevant compliance obligations, which is reflected in the Charity's employee induction and training materials. We also support an open and transparent culture that encourages employees and others to raise concerns about anything that is unlawful or amounts to improper conduct. We also seek to ensure matters can be raised in confidence without fear of reprisals.

Our supply chain

We expect and take all reasonable and practical steps to require all suppliers in our supply chain to adhere to our values and policies.

We have taken steps to satisfy ourselves that our current suppliers both support and comply with The Act and also ensure they are aware of our expectations of compliance.

The steps we take to ensure compliance along our supply chain includes:

- Targeted training to our Procurement and Human Resources teams
- Supplier selection tender documentation to reflect the provisions of the Act
- Contractual terms and conditions for suppliers that reflect the provisions of the Act
- Supply chain risk assessment
- Making all suppliers aware of our expectation that they support and comply with the Act
- Where required, supplier audits conducted to verify measures in place and compliance to the Act

- Any material risks identified by our regulatory team in our supply chain raised with our Audit Committee
- An annual report on compliance with the Act provided to Nuffield Health's Audit Committee to determine whether any additional steps are required in how we work with our supply chain.