

## **MODERN SLAVERY STATEMENT F/Y 2019**

**HCA International Limited makes this statement to comply with s.54(6) of the Modern Slavery Act 2015 on behalf of itself and all its Group companies (collectively referred to as 'HCA UK' in this statement).**

### **HCA UK's position on Modern Slavery**

HCA UK is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour. HCA UK is committed to promoting ethical and lawful employment and supply chain practices. These practices are also required to be followed by our suppliers, sub-contractors and business partners worldwide.

HCA UK will not tolerate slavery, servitude, forced or compulsory labour in the manufacture of products we use or sell and will not accept products or services from suppliers who employ or utilise slavery, servitude, forced or compulsory labour in any manner.

In order to detail our responsibilities, HCA UK has in place a Human Trafficking Policy which sets out the obligations on HCA UK colleagues, management and our supply chains to ensure that slavery and human trafficking does not occur.

### **Our Mission Statement and Values**

**Above all else, HCA UK is committed to the care and improvement of human life.**

In pursuit of this mission, we act with absolute honesty, integrity and fairness in the way we conduct our business, and we pledge to treat our colleagues, our customers and our employees with loyalty, respect and dignity. We make these commitments in our Code of Conduct which is provided to all HCA UK employees and is available via our website. The Code of Conduct provides guidance to ensure that everything we do is done in an ethical and legal manner and emphasises the shared common values and culture that guide our actions. It also contains resources to help resolve questions about appropriate conduct in the workplace.

### **HCA UK's relationship with our supply chain**

HCA UK - including our contracting and supply chain arm, HealthTrust Europe (HTE) – requires our suppliers to support our mission, and our core values of honesty, integrity and fairness. Our zero-tolerance approach to modern slavery extends to our suppliers too. This is absolutely critical to fulfilling our mission and maintaining a healthy work environment.

Given our size and the range of specialisms in which we excel, we naturally buy a wide range of goods and services both in the provision of healthcare to our customers and to enable our routine business. Our due diligence processes seeks confirmation from the supplier that they are compliant with the Modern Slavery Act 2015 (where that supplier has an annual turnover in excess of £36 million).

### **Policies**

In order to detail our responsibilities in respect of modern slavery, HCA UK has in place a Human Trafficking Policy which sets out the obligations on colleagues, management and our supply chains to ensure that slavery and human trafficking does not occur. This is one of a number of policies in place to embed our Ethics & Compliance Programme. Adherence to these policies helps us to ensure that we are conducting business in an ethical and transparent manner. The other policies which cover Modern Slavery include, but are not limited to:

- HCA UK Code of Conduct
- Speaking Up Policy
- Human Trafficking Policy

- Safeguarding Children and Young People Policy
- Corporate Safeguarding Strategy
- Safeguarding Adults at Risk Policy

### **Training**

HCA UK has a robust training programme in place for all our staff members, which starts with a two day corporate induction. On an on-going basis, our training programme includes bespoke annual learning provided to our leaders which is tailored to their role for the company. This is refreshed every year to reflect current compliance and ethics trends in our company, sector or in the communities in which we operate. HCA UK's safeguarding training encourages our people to understand that children and young adults are especially vulnerable to criminal and sexual exploitation and to be aware of the domestic servitude indicators of modern slavery. All other permanent colleagues are required to complete annual ethics and compliance training. In all our ethics and compliance training (including that provided at our corporate induction events for all new starters), the theme of modern slavery is covered in detail, and attention drawn to our policies and procedures in this area.

### **Our focus for the next twelve months**

To reflect the increased focus on this topic in legislation and society, we continue to focus on modern slavery in our internal training, including how to report concerns to our Freedom to Speak Up Guardian or to external authorities. Our training in this area includes increasing awareness of the practical signs of modern slavery and indentured employment which may be visible in a hospital and care setting.

We will carry out selected audits of our suppliers to ensure that we can be confident to endorse our supply chain. If concerns are identified during these audits, we will endeavour to work with the supplier to improve their practice and if we do not consider this to be successful, we will review future use of that supplier.

All our efforts will demonstrate our responsibility as a healthcare provider to share and promote best practice in all areas associated with physical and emotional well-being.

### **Responsibility for this statement**

At HCA UK, we believe in setting the tone from the top. Responsibility for the prevention of modern slavery rests with the Company's leadership who have overall responsibility for this statement and for ensuring that policy, internal systems and controls are kept under regular observation to ensure that there is no gap between what we say we will do and what we actually do. In this spirit, this statement is approved by the Board of HCA International Limited, and is signed by our President and Chief Executive Officer.

John Reay

This version: November 2019

### **About HCA International Ltd**

HCA UK is a network of world-class, award-winning private hospitals, specialist clinics, outpatients and diagnostics centres and private GP services across London and Manchester. As well as providing advanced, high-quality care to patients in these environments, we also partner with leading NHS Trusts.