



**healthcare at home**

it's where you want to be

## Modern Slavery Statement

Healthcare at Home Ltd ('HaH') has a zero-tolerance approach to Modern Slavery, Human Trafficking and Child Labour. We are committed to our values to 'Exceed Expectations, Collaborate, ensure Patient Focus and to be straightforward in the work we do, including ethically in all our business dealings. To achieve our objective, we commit, monitor and improve the systems and controls operating to ensure transparency in our supply chains. Our proactive approach to due diligence seeks to ensure Modern Slavery, Human Trafficking and Child Labour never takes place within our own business and that we only partner with those that live these principles.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It constitutes HaH's Slavery and Human Trafficking statement for the financial period ending 31 October 2020.

## Healthcare at Home's Business

HaH is a leading provider in the UK of clinical care services in the home. Our head office is based in Burton on Trent, Staffordshire, UK. We are a private limited company within the Halcyon Topco Limited group, with around 1500 employees. We are the largest provider of clinical care in the home to private and NHS patients, including complex clinical nursing, compounding services, pharmaceutical dispensing, delivery of medication operating across the European Economic Area, and serving around 190,000 patients a year in the United Kingdom.

## Our supply chains

HaH operates in a highly regulated industry and given the nature of our business, we believe there is a low risk of Slavery, Human Trafficking or Child Labour having a connection with our commercial activities. In addition, many of our key suppliers are members of the Pharmaceutical Supply Chain Initiative ('PSCI') and this body has established a set of principles to support suppliers in establishing sustainable, ethical and responsible labour practices. Further details relating to the PSCI are available at <https://pscinitiative.org>.

## Due diligence processes for Slavery, Human Trafficking and Child Labour

We maintain a governance and risk management framework with ongoing review of risk throughout the year. This process covers all our business areas and is reportable at Board level. Although it is considered that HaH has a low direct risk of Slavery, Human Trafficking or Child Labour, we have applied a risk and assurance-based approach to mitigate residual risks. This approach assists us to identify suppliers, where it is considered that additional assurance is required that they comply with our ethical approach to supply chain management. Typically, this includes pharmaceutical suppliers with multinational operations, in locations where the inherent risk is potentially higher. We continue to work with these key suppliers, as part of our supply chain due diligence, to confirm their understanding of this legislation and where relevant, compliance initiatives.

During 2019-2020, HaH undertook a review of the Modern Slavery Statements published by our supply chain partners. Again, we were able to confirm significant awareness of this legislation and the many proactive measures to manage sector risks. These suppliers are also subject to national, regional and global governance obligations, which help to define how they operate.

In addition, we also undertook a review of our procurement policies and procedures, and those activities associated with supplier validation. This initiative was designed to further strengthen our internal processes, as part of our commitment to continuous improvement and compliance with this Act.



All our new suppliers are subject to due diligence and we regularly review our supply chain partners to provide robust assurance that compliance is maintained. This includes a rigorous selection process and due diligence appraisal activities, and targeted interventions for assurance purposes, as part of our vendor and supplier controls. Our agreements with suppliers include requirements for third party providers to obey national and regional statutory requirements in the country in which they operate. We will only work with suppliers who commit to a zero-tolerance approach to Slavery, Human Trafficking and child labour.

## Accountability

Where we find that a supplier does not comply with the high ethical standards set by HaH, we commit to fully co-operating with all relevant agencies to address compliance.

## Whistleblowing

We encourage all our workers, customers and business partners to report any concerns related to HaH activities. Our whistleblowing Policy and Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. HaH encourages an open culture where any concerns can be raised in a safe, supportive and confidential environment. The Whistleblowing Policy and Procedure is part of a wider suite of Policies, encompassing our Code of Conduct and expectations around Corporate Social Responsibility.

## Awareness, Compliance and Training

The Policies and Procedures by which HaH operates reflect our commitment to our core values including the expected standard of conduct of all workers, sub-contractors and agents.

HaH has established a mandatory training framework, which supports our commitment to regulatory compliance, including Modern Slavery, Anti-bribery and Safeguarding. We require all our workers to have an awareness of our Policies and complete the mandatory training which is actively monitored.

## Further steps

HaH will continue to provide adequate resources, training and investment to ensure the successful application of this statement, and the work undertaken is proportionate to the risks in relation to our supply chain.

This statement has been approved by the Boards of Healthcare at Home Ltd and Halcyon Topco Limited.

**Darryn Gibson**  
Chief Executive Officer

Date: May 2020

**John Bradshaw**  
Group Company Secretary & Director