

# Slavery and Human Trafficking Statement

## Financial Year end 31 March 2021

This statement is made by Healthcare at Home Ltd (HaH) and Halcyon Topco Limited which are part of the Sciensus group of companies. HaH has a zero-tolerance approach to Modern Slavery, Human Trafficking and Child Labour. We are committed to our company values and work 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 year ending 31 March 2021.

### Our 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 with around 1700 employees. We are one of the largest providers 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 over 200,000 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. These suppliers will also be subject to national, regional and global governance obligations, which should help to regulate how they operate.

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 them 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. If any employee comes across any wrongdoing or malpractice in the workplace that are in the public interest to disclose, they can contact our independent third-party whistleblowing service. The Whistleblowing Policy and Procedure is part of a wider suite of Policies, encompassing our Code of Conduct and expectations around Corporate Social Responsibility.

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### **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.

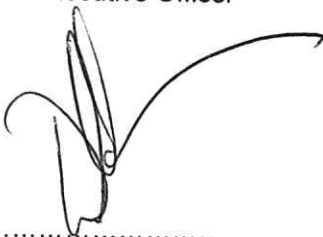
### **Further steps**

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 includes undertaking a risk assessment of our supply chain, together with a review of our supplier onboarding process and our contract lifecycle management framework. We are launching standard terms of purchase and these will include a requirement that suppliers comply with all anti-slavery and human trafficking laws, statutes and regulations. We will continue to take proactive measures to monitor supplier compliance with all relevant anti-slavery legislation.

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

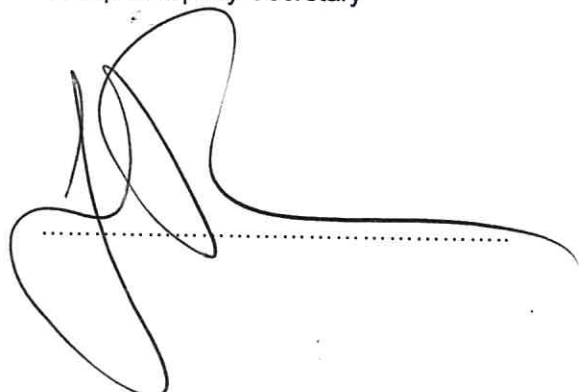
**Darryn Gibson**

Chief Executive Officer



**John Bradshaw**

Group Company Secretary



Dated : 24th September 2021