

MODERN SLAVERY STATEMENT

SpaMedica Ltd is a leading independent provider of eyecare services for NHS and private patients in England, Wales and Northern Ireland. SpaMedica is a limited company registered in England and Wales, registered number 664429. SpaMedica is a member of Veonet which is a pan European group of healthcare companies.

POLICY

SpaMedica prohibits slavery, servitude, forced or compulsory labour and human trafficking in our business services and supply chain. We will not knowingly deal with any business involved in slavery or human trafficking of any kind. We support ethical business practices and policies to protect workers from any abuse or exploitation in relation to our business and supply chain. Our Anti-Slavery Policy is published to all employees in our policies register.

STRUCTURE

SpaMedica employees c. 2,000 staff across 55 hospital sites and Head Office support functions. We also use some specialist sub-contractors and service companies in addition to our regular consumable stock, equipment and drug suppliers.

DUE DILIGENCE

Before contracting with a new supplier, we complete appropriate due diligence on that organisation. This includes a review of their modern slavery statement on their website and, in some cases, their annual report, modern slavery policies or any relevant media reports. We continually review supplier contracts so that they comply with modern slavery requirements.

RISK ASSESSMENT

We are mindful that modern slavery could occur in our own business or UK-based services contractors as well as UK or overseas manufacturers. In the past year, we identified our major suppliers by spend and categorised them into low, medium and high risk. To date, we do not have any of these suppliers classified as high risk.

Risk factors used include:

1. Industry type
2. Nature of workforce
3. Supplier location
4. Context in which supplier operates
5. Commodity type
6. Business/supply chain model

Most of our suppliers send goods to us from within the UK or EU. However, we are aware that many key suppliers will be themselves supplied by manufacturers in much higher risk areas. We therefore continue to seek specific assurance around modern slavery from our higher-risk suppliers regarding their own supply chain.

EFFECTIVENESS

We build long standing relationships with our suppliers, based on mutual trust and transparency. We actively encourage the reporting of any wrongdoing and protect whistle-blowers. We encourage colleagues to raise any concerns around modern slavery with their line manager or a member of the People team, or to use the national helpline 08000 121700 or www.moderslaveryhelpline.org to report those concerns.

We take a zero-tolerance approach towards slavery and human trafficking and, where possible, our supplier contracts include clauses to that effect. We will evaluate any instances of non-compliance in our supply chain on a case-by-case basis and may choose to work with suppliers to improve their practices.

TRAINING

To ensure all our employees understand the risks of modern slavery and human trafficking in our business and supply chains, each of our colleagues completes specific mandatory training on induction and annually thereafter. The Governance Manager and Procurement Manager participate in more detailed Modern Slavery training and share resources from a variety of sources, including the Independent Healthcare Providers Network and the Institute of Chartered Accountants in England and Wales.

REVIEW

This statement is reviewed annually, unless circumstances dictate that it should be reviewed more frequently. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2023. It was approved by the board of directors on 25 June 2024.



Martin Johnson
Chief Financial Officer
SpaMedica Limited
Date:28 June 2024