

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps the Company has taken during the financial year ended 31 December 2019 to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Introduction

NES Holdings (UK) Limited is the holding company for a group of companies providing healthcare management services in the UK and South Africa. Our registered office is in the UK in Norwich and we have approximately 550 employees in our Group, with 540 based in the UK.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

We do not act as a producer, manufacturer or retailer of physical goods and have no supply chains in relation to such activities.

During 2019, NES Holdings (UK) Limited has developed processes and procedures to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Key areas of focus have been embedding procurement strategy processes in supplier selection and training all employees in engaging suppliers on supplier sourcing and due diligence.

Our Policies on Slavery and Human Trafficking

NES Healthcare's internal policies include our Anti-Slavery and Human Trafficking Policy which confirm our zero-tolerance approach to modern slavery, reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our policies are supported by our Whistleblowing Framework, which encourages and provides clear guidance on raising concerns in confidence relating to any potential wrongdoings, including slavery and human trafficking. All reports are fully investigated and appropriate remedial actions taken.

Assessment of Modern Slavery Risk within our Supply Chain

In our focus on Modern Slavery, we review risk assessments to determine where the risk of modern slavery and human trafficking lies both within the Group and in its supply chains.

Suppliers have been assessed in terms of the nature of services they supply to the Group and the geographical risk. These assessments cover the entire scope of our business, encompassing recruitment agencies, software suppliers and developers, building contractors, cleaning companies and other professional service providers. Geographically, most suppliers are based in the UK (or we contract with and make payment to the UK office) with the exception of some professional suppliers.

We understand that our biggest exposure to Modern Slavery remains with organisations that, whilst having a UK office base, utilise the services of individuals based in countries with emerging economies. Existing suppliers have been made aware of our zero tolerance of modern slavery and procedures have been put in place to make new suppliers aware of our zero tolerance policy when they request to work with us. Responses are reviewed by senior management before a new supplier is approved.


Training

New employees are trained in our Code of Conduct and Human Trafficking Policy as part of their induction process and regular update training is provided to all our existing employees with specific follow up for any unable to attend the main sessions.

The training content and procedures are regularly reviewed to ensure they remain appropriate and up to date and that results of any investigations or remedial actions are properly reflected in the training programme.

This statement was approved by the Boards of NES Holdings (UK) Limited and its subsidiaries.

Signed

A handwritten signature in black ink, appearing to read 'P. Sheppard', followed by a long horizontal line that loops back to the right.

Peter Sheppard

Managing Director

NES Holdings (UK) Limited