

POLICY TITLE	<b>Modern Slavery Statement</b>
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## Introduction

This statement sets out Omnes Healthcare's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2024 to 31 March 2025.

As an organisation, we do not have an obligation to publish a statement as our turnover is less than the threshold but we have chosen to do so anyway.

As part of the healthcare sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continued to take our responsibility very seriously during the coronavirus pandemic.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational structure and supply chains

This statement covers the activities of Omnes Healthcare:

- We provide Primary and Secondary Care services on behalf of the NHS in a number of locations and contracts over the UK.

### *Countries of operation and supply*

We currently operate only in the UK.

### *Responsibility*

Responsibility for our anti-slavery initiatives is as follows [select the relevant areas from the list below]:

- **Policies:** Head of HR and Governance Director
- **Risk assessments:** Head of HR and Governance Director
- **Investigations/due diligence:** Head of HR, Governance Director and Clinical Director
- **Training:** This statement is shared with all employees to be read in our intranet. As part of the induction, all employees are to attend Safeguarding Adults courses of different levels depends on their role.

### **Relevant policies**

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations [select the relevant policies from the list below and include links to the full text]:

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment & Onboarding policy** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. We follow through and robust onboarding processes to ensure that all employees have the relevant documentation and compliance.

## Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all staff to have completed training on modern slavery and safeguarding on their first days of employment and then annually; and
- reviewing its existing supply chains annually, whereby we evaluate all existing suppliers.

## Training

We require all staff within our organisation to complete training on modern slavery as part of our Safeguarding adults modules at the beginning of their employment to be reviewed annually.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;