

Modern Slavery Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**) and covers the period since our last statement.

Our business and values

Spire Healthcare is a leading independent provider of healthcare services with 39 hospitals, eight clinics and one oncology centre across England, Scotland and Wales. We are a public company quoted on the London Stock Exchange (SPI: LSE). Our registered office is 3 Dorset Rise, London EC4Y 8EN. Our financial year ends 31 December.

We have a focus on quality as part of the commitment we make to our patients. More broadly, our values embody a commitment to act ethically and with integrity in all our relationships.

Whilst we are a UK-based business, delivering care through our highly-skilled teams and the vast majority of our suppliers originate from countries not deemed high risk for modern slavery, we take this issue extremely seriously.

As such, we have a zero tolerance approach to modern slavery. Our cross-department 'working group' operates to develop and oversee the implementation of a plan to prevent modern slavery and human trafficking from touching our business and supply chains. As a result, we expect the same standards from all our contractors, suppliers and other business partners.

Procurement and our supply chain

As a national, multi-site organisation, we buy a wide range of goods and services, from surgical equipment and medicines, through to corporate clothing and waste disposal. Some of these products and services are used in the provision of healthcare to patients such as new knee or hip joints. Others will be used within our own business such as office supplies. Thousands of suppliers engage with us, who in turn have their own supply chains, making our end-to-end supply chains complex.

In order to ensure other organisations comply with our own standards and values, we have put in place a number of measures to assess and manage supply chain risk. These include undertaking due diligence on our key suppliers by periodically auditing their modern slavery statements and also through mandatory compliance

terms in all new or updated supply contracts. We focus our supplier due diligence by identifying higher risk suppliers by category of product and/or the geography of their operations. We are also working to enhance our supplier tender process for any modern slavery risk.

Where a key supplier does not satisfy us of their position on modern slavery, we will work with them to raise standards in this area. If there is a lack of engagement or sufficient assurances, we will review the continued use of that supplier with a view to changing to a supplier which is able to meet our standards on modern slavery.

Training and policies

We train our procurement team on our modern slavery obligations and the Modern Slavery Act. In addition, we train each of the Registered Managers and Matrons of our hospitals, as well as many other staff in key roles across our business. In 2019, we will continue to develop our training programme to inform and raise awareness on modern slavery across the Group and look to assess engagement and understanding through future staff surveys. We are also reviewing and updating all relevant policies that touch on the issues arising under the Modern Slavery Act such as safeguarding and procurement.

Raising Concerns

We know it is our colleagues on the frontline of delivering patient care who are most likely to come across victims and raise concerns. We are committed to dealing with any concerns raised in an open and honest manner, empowering and protecting those who raise concerns. Our colleagues can report concerns through a variety of channels including our network of local Freedom to Speak up Guardians or, if necessary, via a confidential external whistleblowing helpline.

A handwritten signature in black ink, appearing to read 'Justin Ash'.

Justin Ash

Chief Executive Officer

On behalf of the Board of Directors of Spire Healthcare Group plc

26 March 2019