

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 (available on our website).

Business Structure and Supply Chain

Spire Healthcare Group plc is a leading independent provider of healthcare services with 39 hospitals and eight clinics 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.

Our purpose is to 'make a positive difference to our patients' lives through outstanding personalised care'. Part of making that positive difference to patients' lives comes from our commitment to act ethically and with integrity in all our relationships, meaning we have a zero tolerance approach to modern slavery. Whilst we are a UK-based business, and the vast majority of our suppliers originate from countries not deemed high risk for modern slavery, we take this issue extremely seriously.

A 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 national, multi-site organisation, we buy a wide range of goods and services, from surgical equipment and medicines, through to 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.

Due Diligence

As part of our efforts to monitor and reduce the risk of modern slavery occurring within our supply chains in 2019, we identified a cohort of higher risk suppliers (identified by category of product (including food, clothing and low-cost consumables) and/or the geography of their operations) and engaged with them to complete a modern slavery questionnaire which was fed into a risk-assessment tool. The results of this enhanced risk assessment exercise gave us assurance that those suppliers take appropriate measures to manage modern slavery in their business.

In 2019 we also obtained the modern slavery statements for all suppliers representing 50% of the business's total procurement spend. We are in the process of completing a detailed review and risk scoring of these statements and will complete this exercise in 2020. From 31 March 2020 we will put all new material suppliers through a modern slavery due diligence process and any supplier who demonstrates a risk will be required to complete the enhanced questionnaire and risk assessment tool exercise. All new or updated supply contracts continue to include mandatory anti-slavery compliance terms and in 2020 we will also be developing our supplier tender process for any modern slavery risk.

To date we have not had an issue with a supplier's modern slavery compliance position. If such an issue were to arise then we would look at alternative suppliers and either (depending on the circumstances and nature of the non-compliance) immediately cease dealings with the supplier, or work with that supplier to get the necessary assurances to continue using them.

Policies

Key policies relating to the risk of modern slavery touching our business were updated in 2019 (including specific updates for modern slavery). These policies comprise the group procurement policy and the linked policies on safeguarding adults at risk and safeguarding children/young people. In 2020 we will also be updating our policy for reporting concerns.

Training

In 2019 we trained our procurement team, hospital directors, directors of clinical services and freedom to speak up guardians on our modern slavery obligations and the Modern Slavery Act. Also all our local safeguarding leads completed their Level 4 Safeguarding Officer Training (which included modern slavery). In 2020, we will continue to develop our training programme to inform and raise awareness on modern slavery across the Group. This will include broadening training to hospitals' senior leadership teams. We will also look to assess engagement and understanding of modern slavery through future staff surveys and will raise awareness across the Group by a campaign timed with National Anti-Slavery Day.

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', central concerns email 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

4 March 2020