



healthcare at home
it's where you want to be

Modern Slavery Statement

Healthcare at Home Ltd ("HaH") has a zero-tolerance approach to Modern Slavery, Human Trafficking and Child Labour. We are committed to our values to 'Exceed Expectations, Collaborate, ensure Patient Focus and be Straightforward' in the work we do, including ethically in all our business dealings. To achieve our objective, we commit to monitor and improve the systems and controls operating, to ensure Modern Slavery, Human Trafficking and Child Labour is not taking place within our own business and our supply chain.

This statement is made pursuant to section 54 Part 6 of the Modern Slavery Act 2015. It constitutes HaH's Slavery and Human Trafficking statement for the financial year ending 31 October 2019.

Healthcare at Home's Business

HaH is the UK's leading provider of clinical care in the home. Our head office is based in Burton on Trent, Staffordshire, UK. We are a limited company within the Halcyon Topco Limited group with around 1500 employees in the UK. We are the largest provider of clinical care in the home to private and NHS patients, including complex clinical nursing, dispensing and delivery of medication operating in the UK (and within the Halcyon Topco Limited Group in Germany, Austria and Switzerland), and serving around 170,000 patients a year in the UK.

Our supply chains

HaH operates in a highly regulated industry and given the nature of our business, we believe there is a low risk of Slavery, Human Trafficking or Child Labour having a connection with our commercial activities. However, we ensure we monitor this risk by keeping our supply chain and working practices under review.

Due diligence processes for Slavery, Human Trafficking and Child Labour

We maintain a governance and risk management framework with ongoing review of risk throughout the year. This process covers all our business areas and is reportable at Board level. Although it is considered that HaH has a low direct risk of Slavery, Human Trafficking or Child Labour, we have applied a risk and assurance based approach to mitigate residual risks. This approach assists us to identify any suppliers, where it is considered that additional assurance is required that they comply with our ethical approach to supply chain management. Typically, this includes pharmaceutical suppliers with multinational operations, in locations where the inherent risk is potentially higher. We continue to work with these key suppliers, as part of our supply chain due diligence, to confirm their understanding of this legislation and where relevant, compliance initiatives.

HaH has been able to confirm significant awareness of this legislation with our supply chain partners. These suppliers are also subject to national, regional and global governance obligations, which help to define how they operate. Our objective is to have long lasting productive relationships and only source from those suppliers that satisfy HaH's ethical standards.

All our new suppliers are subject to due diligence and we regularly review our supply chain partners to provide robust assurance that compliance is maintained. This includes a rigorous selection process, due diligence appraisal activities and targeted interventions for assurance purposes, as part of our vendor and supplier controls. Our agreements with suppliers include requirements for third party providers to obey national and regional statutory requirements in the country in which they operate. We



will only work with suppliers who commit to a zero-tolerance approach to Slavery, Human Trafficking and child labour.

Accountability

Where we find that a supplier does not comply with the high ethical standards set by HaH, we commit to fully co-operating with our supplier and where necessary with all relevant agencies to address compliance.

Whistleblowing

We encourage all our workers, customers and business partners to report any concerns related to HaH activities. Our whistleblowing Policy and Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. HaH encourages an open culture where any concerns can be raised in a safe, supportive and confidential environment. The Whistleblowing Policy and Procedure is part of a wider suite of policies which support our compliance with this statement, encompassing our Code of Conduct and expectations around Corporate Social Responsibility.

Awareness, Compliance and Training

The Policies and Procedures by which HaH operates reflect our commitment to our core values including the expected standards of conduct of all workers, sub-contractors and agents.

HaH has established a mandatory training framework, which supports our commitment to regulatory compliance, including Modern Slavery, Anti-bribery and Safeguarding. We expect all our workers to have an awareness of our Policies and to complete mandatory training which is actively monitored.

Further steps

HaH will continue to provide adequate resources, training and investment to ensure the successful application of this statement and that the work undertaken is proportionate to the risks in relation to our supply chain.

This statement has been approved by the Boards of Healthcare at Home Ltd and Halcyon Topco Limited and is signed on their behalf.

Darryn Gibson
Chief Executive Officer

John Bradshaw
Group Company Secretary & Director

Date: 4th February 2019