

NMC Health plc Modern Slavery Statement 2018

This statement has been published in accordance with the Modern Slavery Act 2015. This is the first Modern Slavery Statement published by NMC Health plc (NMC) and follows the acquisition of UK operations into the Group for the first time in August 2018 and increased focus on various aspects of Environmental, Social and Governance issues in 2018.

Introduction

Modern Slavery is a growing global issue and takes various forms including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another or to exploit them for personal or commercial gain. NMC takes a zero-tolerance approach to Modern Slavery and human trafficking within our own businesses and our supply chain and as part of an amplified focus on this area, we are increasing our staff training and supplier reviews.

Our Business and Supply Chains

NMC is the leading private healthcare operator in the Gulf Cooperation Council (GCC), with international services across 17 countries, and is one of the largest fertility services providers in the World. NMC also operates a product distribution business and has a substantial network of suppliers from different regions of the World.

Over the last four decades, NMC has earned the trust of millions, thanks to its personalized care, genuine concern and a sincere commitment to the overall well-being of our patients. NMC's strategic acquisitions coupled with our legacy institutions have allowed us to fill the service gap in our healthcare delivery system and offer a continuum of care to patients.

Today, NMC has created a strong, inter-connected, integrated multi-vertical and multi-brand private healthcare network with the scalability and flexibility to grow our operations in the future. With a team of over 2,000 doctors and 18,000 paramedical and support personnel, NMC owns and manages over 135 healthcare facilities that includes hospitals, medical centres, long term care facilities, day surgery centres, fertility clinics and home health services. Every year, over 8.5 million patients are treated by NMC doctors across UAE, Saudi Arabia, Kuwait, Oman, UK, Spain, Italy, Denmark, Slovakia, Egypt, Brazil and Colombia.

Our policies, controls and framework

NMC has a number of policies in relation to, or connected with, how we conduct our business, how we deal with people and suppliers and how we look after our employees:

- *Modern Slavery Policy* – approved in 2018, this specific policy sets out our position and abhorrence as an organisation in relation to all forms of slavery, servitude, forced and compulsory labour and human trafficking.
- *Anti-Bribery, Anti-Corruption, Gifts and Entertainment Policy* – approved in 2012 and updated in 2018, this policy sets out our expectations of our employees and others who work in our business in relation to Bribery and Corruption matters. It includes specific guidance in relation to the provision, and receipt, of gifts and entertaining.
- *Code of Business Conduct and Ethics* – approved in 2012 and updated in 2018, this policy sets out the basis on which we expect our employees, contractors and businesses generally to behave and operate.
- *Whistleblowing Policy* – Updated in 2018, this policy sets out our framework for any individual who wishes to raise concerns or report misdemeanours relating to any business or employee of NMC. In addition to the updated policy, our Whistleblowing procedures have been updated in 2018.

In addition to these formal policies we have a number of other new or updated employee engagement policies which we believe are appropriate for NMC as a Group and help all employees of the Group keep engaged with the business or raise any concerns on ethical matters which they believe to be of concern.

We have published a copy of each of the policies and procedures on the Group's corporate intranet and will be rolling out awareness of all such policies to employees on a phased basis during 2019 and through new employee induction processes.

Modern Slavery training and awareness

Following the approval by the NMC Health plc Board of our Modern Slavery Policy, and updating of the various ethical group policies as outlined above, we have commenced a planned roll out through a training programme to upskill our HR teams throughout the Group on a train the trainer basis to:

- refresh knowledge, and increase awareness, amongst our employee base of the Anti-Bribery, Anti-Corruption, Gifts and Entertainment Policy, Code of Business Conduct and Ethics and Whistleblowing Policy, including revised Whistleblowing procedures; and
- introduce the Group's new Modern Slavery Policy and to make people aware of the issue of modern slavery and human rights in the workplace and across the World.
- Specifically develop our managers' knowledge of the issue of Modern Slavery in order to have increased vigilance across our organisation at local level

In addition, we have updated the NMC Board and Senior Management so that they have full awareness on their role and accountability in eradicating Modern Slavery in our supply chain where it is found to exist

Assessment of Modern Slavery risk

➤ In our business

Our consideration of Modern Slavery and Human Rights abuse risks within our own organisation have been considered in relation to:

- The treatment of our own employees;
- The treatment of individual who work within our facilities on a contracting or outsourced basis.

We employ individuals across our business and provide appropriate levels of remuneration and benefits for each employee role dependent on local market conditions. We are aware that many of our employees choose to work for us on an ex-patriate basis away from their home country and sometimes their family. We take steps to acknowledge this and try to provide an environment in which all of our employees live in a happy and healthy environment.

In addition to providing accommodation to such employees and a significant number of employee engagement and social activities each year, each facility has a Happiness Officer who is available to address any concerns specific employees have from time to time. In the UAE, NMC Healthcare was voted as “One of the Best Places to work” in 2018.

➤ In our supply chain

In Q4, 2018, as we were formally recording and developing both our approach to Modern Slavery and refreshing various other internal ethics policies and procedures, we considered in more detail the areas of potential risk in our supply chain. Whilst all business sectors and regions Worldwide are vulnerable to modern slavery abuses, we believe that the size, geographic location and products supplied by the vast majority of our suppliers result in a relatively low risk of Modern Slavery across our supplier base.

Our primary product supply to the Group of FMCG, pharmaceutical goods and medical equipment, are considered to be at a lower end of risk than exists in other business sectors. We are also aware that the vast majority of the products that we sell or distribute through our distribution division are from large multi-national organisations many of whom have their own modern slavery and ethical trading policies and processes.

However, we are in the process of strengthening our assessment of Modern Slavery risk within our supplier base as outlined below.

Due diligence of suppliers and supply chain

We have not, to date, formally asked our suppliers to provide information in relation to their specific Modern Slavery and human rights policies, but we are considering the introduction of such a process. However, all supplier agreements entered into or renewed from 2019 onwards will include specific clauses to ensure such suppliers confirm that neither they nor their employees have ever breached the terms of the Modern Slavery Act and under which they warrant compliance with the same going forward.

Any supplier who breaches the terms of this clause is subject to immediate cancellation of our contractual agreement with them.

Key areas of focus in 2018

In 2018 we have focussed our efforts on considering Modern Slavery and human rights within our own organisation and the risk perceived across our supplier base. The Board of NMC Health plc has adopted a Group-wide Modern Slavery policy and we have refreshed existing associated Group ethical policies. We have also reviewed our policies and procedures to ensure that the welfare of our employees is not at risk from slavery or human rights abuses. We have also reviewed the organisations supplying specific services to us, specifically recruitment services, in order to assure ourselves that they source staff ethically, without inducement and in line with NMC recruitment practices.

As outlined above we have developed a contractual clause which we will be inserting into all future supplier contracts to ensure compliance with the terms of the Modern Slavery Act 2015.

Key areas of focus in 2019

In 2019 we will be increasing awareness of slavery and human rights issues across our Group businesses. This will be achieved through training programs through our HR organisation and onwards to our management and employee base. All of our ethical and Modern Slavery policies and procedures are published in our Group intranet and form part of each employees' induction program.

We will also be updating our supplier contracts to include a warranty and breach remedies in relation to any Modern Slavery Act abuses.

During 2019 we will monitor progress being made across the ethical and human rights efforts we have been undertaking and will give consideration to additional supplier monitoring and risk assessment processes.

As an organisation, we have always sought to consider the welfare of all individuals that we interact with. Care and welfare for all is the bedrock of the services we provide, and we will continue to develop policies and procedures to seek to eradicate all forms of slavery, forced labour and human rights abuses and ensure our organisation and employees continue to conduct themselves in an ethical manner.

Prasanth Manghat

Chief Executive Officer

For and on behalf of the Board of NMC Health plc