

Classification:
Internal & External



Modern Slavery Statement 2026

Modern Slavery Act Statement 2026

This statement is made on behalf of Optima Health PLC and subsidiary companies; Optima Health UK Limited (hereafter collectively "Optima") pursuant to section 54 (1) of the Modern Slavery Act 2015 (the 'Act') and constitutes our slavery and human trafficking statement, for the financial year (1 April 2025 to 31 March 2026) to prevent modern slavery and human trafficking within our business and supply chains.

Optima are absolutely committed to acting ethically and with integrity in all business relationships. We maintain a zero-tolerance approach to modern slavery and are dedicated to ensuring that our corporate activities, and supply chains are free from slavery, exploitation, and human trafficking.

Organisational structure and supply chains

Optima is a UK and Ireland based occupational health services provider, focused on helping our clients deliver Healthy High Performance. This means working in partnership with our clients to create a workplace culture that recognises employee wellbeing as being at the heart of business success. We deliver a comprehensive range of services via a nationwide network of practitioners including absence management, fitness for task assessments, health surveillance, vocational rehabilitation, and wellness programmes.

Applying multidisciplinary expertise and deep industry knowledge, our Optima specialists work with predominantly UK clients from many market sectors, including central and local government, financial services, media, transport, and logistics.

As a people-based service the majority of our suppliers are those providing clinical and professional expert resource or the supply of medical consumables.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

Optima operate a supplier policy and undertake due diligence on all our suppliers. The due diligence includes a statement that each supplier is required to complete to show that the organisation:

- Complies with Modern Slavery Act
- Takes steps to eradicate modern slavery from their business.
- Holds their own suppliers to account over modern slavery.
- Ensures their workers receive the minimum wage and undertake robust immigration checks.

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We may terminate the contract at any time should any instances of modern slavery come to light.

While Optima Health's core operations are UK- and Ireland-based and primarily service-led, we recognise that modern slavery risks can still arise through labour supply chains, outsourced services, and the procurement of goods such as medical consumables. Risk is therefore assessed using a proportionate, risk-based approach rather than geography alone.

Relevant Policies

Supplier/Procurement

We maintain a documented process for sourcing and approving third-party suppliers. All suppliers must complete a compliance statement confirming adherence to standards relating to:

- Modern Slavery Act compliance
- Quality and environmental management
- Health and safety
- Information security
- Equal opportunities
- Recruitment practices

Suppliers are added to our Approved Supplier Register only after meeting these requirements.

Recruitment Policy

Optima follow a documented Recruitment Policy and Procedure and have strict Security Guidelines in place to support the recruitment process. The organisation uses 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.

Resolution Policy

Optima have a documented Resolution Procedure for the reporting of unlawful discrimination or unethical behaviour in any form through a formal grievance process.

Whistleblowing Policy

The organisation encourages all its workers to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure ensures confidentiality and protection for all workers to make disclosures, without fear of retaliation.

Anti-slavery policy

This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where to go for help or report concerns. Optima Health

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prohibits all form of modern slavery, including child labour, forced labour, bonded labour, human trafficking and forced marriage. These standards apply across all of Optima Health operations and throughout our supply chains.

Company Values

The organisation's values make clear to employees the actions and behaviour expected of them when representing the organisation.

Actions and Outcomes from Previous 12 months

Optima has continued to strengthen its approach to preventing modern slavery and human trafficking. Over the previous 12 months, the following actions have been completed:

Action Completed	Date
Embedded modern slavery risk considerations into our wider ESG / risk management framework (Modern slavery Risk assessment, Social Value Portal commitment,	February 2026
Communicated updated policies internally and made them available externally by creating a policies page on our website www.optimahealth.co.uk	April 2026
Reviewed and updated our Supplier Management Policy in line with Article 54	September 2025
Reviewed our Supplier Questionnaire in line with Article 54	October 2025
Reviewed our Supplier Code of Conduct and relevant procurement policies to ensure alignment with Article 54 requirements	April 2026
Communicated - a Finance section on internal website to include Procurement, we quote "A key aspect of the function is evaluating suppliers through our robust due-diligence process, ensuring all suppliers meet our standards in regard to legislation and contractual requirements. Modern slavery"	November 2025
Introduced enhanced due diligence questions for higher-risk suppliers	October 2025
Requested confirmations from key suppliers regarding their own compliance with the Modern Slavery Act or equivalent legislation. Form updated to request for confirmation that they comply with the Act, if they publish a statement, provide training to employees, map supply chains to high risk areas, ensure minimum wage and that approved suppliers will be required to adhere to our Supplier Code of Conduct (which includes modern slavery act requirements	October 2025
Confirmed procedures to employees for investigating and responding to potential modern slavery concerns	October 2025

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Reviewed and reaffirmed whistleblowing and grievance mechanisms to ensure concerns can be raised confidentially	October 2025
Delivered modern slavery awareness training to 95 % of employees (1593) during the current financial year ending March	1 st April 2025 to 31 st March 2025
Communication issued clearly signposting reporting channels to employees for whistleblowing	March 2026

Actions in Progress

In addition, Optima Health has commenced the following initiatives which are currently underway and form part of our ongoing commitment to continuous improvement:

Actions in Progress	Date
EcoVadis commitment under Optima Health UK Ltd (in progress) and add to Risk committee agenda for next meeting.	Commenced April 2026
Reviewed existing suppliers against risk indicators and prioritised monitoring accordingly. In progress	Project Commenced 2023

Targets and Continuous Improvement

To support accountability and continuous improvement, Optima Health has established the following objectives:

Area	Target	Timeframe
Training	Create specific training module for the People Team, Recruitment and Procurement staff to include child labour, human trafficking and forced labour.	FY 2026
Suppliers	95 % of Tier 1 suppliers screened annually for modern slavery risk	FY 2026
High Risk Suppliers	100% of subject to enhanced due diligence	FY 2027
Risk Reviews	Annual refresh of supplier risk assessments	Ongoing
Disclosures	Move to level 2 across six reporting areas	FY 2026

Progress against these objectives are reviewed as part of our governance and risk processes.

Incident Reporting and Remediation

During the reporting period, no confirmed instances of modern slavery were identified within Optima Health operations or supply chains.

Policies and Procedures

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Where concerns are raised, Optima Health applies a survivor-centred approach, prioritising:

- Protection from retaliation
- Access to appropriate remedy and support
- Cooperation with relevant authorities where required.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain 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 corrective steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans.

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.

We require suppliers to confirm that they:

- Comply with the Modern Slavery Act
- Take steps to eradicate modern slavery within their operations.
- Hold their own suppliers accountable.
- Ensure workers receive at least the minimum wage.
- Conduct robust immigration and right-to-work checks.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) considering the introduction of the Modern Slavery Act 2015. As a result, the organisation:

- Requires Supply chain managers, Recruitment and People professionals to have awareness of Optima Health's statement regarding modern slavery.
- Has a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and

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- Reviews existing supply chains to ensure ongoing compliance.

Modern slavery risk management governance

- Optima Health has a clear governance structure for identifying, assessing, and responding to modern slavery risks:
- Board of Directors – Provides overall oversight and approves the annual statement.
- Chief Executive Officer – Holds executive accountability for modern slavery risk management.
- Chief Operating Officer – Responsible for operational implementation of anti-slavery controls.
- Governance, Risk and Compliance Director – Responsible for internal reviews, maintains policies and monitors adherence.
- People Director – Oversees ethical recruitment practices, training, and workforce protections.
- Head of Procurement – Leads supplier due diligence, risk assessments, and compliance monitoring.

Information Gathering and Preparation of this Statement.

This statement was developed through a cross-functional consultation process involving:

- Legal and Finance
- Procurement
- Governance and Risk
- People Team
- Operational Leadership Team

Each department contributed information on policies, supplier engagement, risk assessments, and due diligence activities. Subsidiary companies were consulted to ensure the statement accurately reflects group-wide practices.

Stakeholder Engagement

To strengthen our understanding of modern slavery risks and improve our practices, Optima Health engages with a range of external stakeholders, including:

- Professional bodies within the healthcare sector.
- Technology and service providers supporting supply chain transparency.
- Government guidance and regulatory updates
- External auditors and compliance consultants

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- Industry forums and networks focused on ethical business practices.
- Clients with enhanced contractual requirements, particularly in regulated sectors such as government, blue light, financial services, and transport. Several of our client contracts require standards that exceed UK Government guidance, and Optima Health ensures full compliance with these higher expectations. This includes additional reporting, enhanced due-diligence checks, and more frequent supplier assurance activities where required.

Where appropriate, we collaborate with suppliers to improve their standards and share best practice guidance.

External Standards and Reporting Alignment

Optima Health's approach is informed by recognised international frameworks, including:

- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- UN Sustainable Development Goals, particularly SDG 8.7

This statement has been prepared with reference to recognised sustainability reporting standards, including the Global Reporting Initiative (GRI) and emerging European Sustainability Reporting Standards (ESRS), to support transparency and comparability.

Chief Executive Officer Approval

This statement has been approved by the organisation's Board of Directors who will review and update it annually.

A handwritten signature in black ink, appearing to read "J. Thomas".

Jonathan Thomas, Chief Executive Officer

Optima Health PLC

Date of Approval: 23 June 2026

J Robertson

A handwritten signature in black ink, appearing to read "Julia Robertson".

Julia Robertson (Chairperson)

Optima Health PLC

Date of Approval: 23 June 2026

Date of Board Approval: 23 June 2026