PAM Group Ltd

Modern Day Slavery Policy HP 038

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Document Change Control

Version	Date	Author	Approver	Change Detail
1 - 5	01/12/2024	Cameron Jackson	People Director	Previous Archived Policies
6	01/04/2026	Cameron Jackson	People Director	Updated Policy Template Updated definitions Updated with legislation and regulation Updated references to other policies and legislation
7	24/09/2026	Tara Wise	People Director	Update to include Optima Health PLC
8	16/11/2026	Tara Wise	People Director	Update to include Optima Health PLC

Policy Owner: People Team

Review Frequency: Annually, or a full policy review could be triggered after legislation changes, or significant changes in case law or guidance.

Next Scheduled Review: April 2027

Approved by: Ruth Weanie, People Director

Distribution: Internal / External

For any queries regarding this policy, please contact the policy owner.

1. Modern Slavery Statement 2026

This statement is made on behalf of PAM Group Ltd, a member of the Optima Health PLC and subsidiary companies; PAM Group Ltd 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 to prevent modern slavery and human trafficking within our business and supply chains.

PAM Group ltd are 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.

2. Organisational structure and supply chains

PAM Group Ltd 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 specialists work with 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:

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

While PAM Group'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.

3. 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

PAM Group 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

PAM Group 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. PAM Group prohibits all form of modern slavery, including child labour, forced labour,

bonded labour, human trafficking and forced marriage. These standards apply across all PAM Group 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.

4. Actions and Outcomes form Previous 12 months

The organisation 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.pamgroup.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.	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
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	1st April 2025 to 31st March 2025
Communication issued clearly signposting reporting channels to employees for whistleblowing	March 2026

5. Actions in Progress

In addition, the organisation 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 PAM Group 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

6. Targets and Continuous Improvement

To support accountability and continuous improvement, PAM Group 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.

7. Incident Reporting and Remediation

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

Where concerns are raised, PAM Group applies a survivor-centred approach, prioritising:

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

8. 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 moder 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.

9. 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 the organisations statement regarding modern slavery.
- Has a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Reviews existing supply chains to ensure ongoing compliance

Refer to the latest electronic version of this document to ensure accuracy.

10. Modern Slavery Risk Management Governance

- PAM Group 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 Procurements - Leads supplier due diligence, risk assessments, and compliance monitoring.

11. 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.

12. Stakeholder Engagement

To strengthen our understanding of modern slavery risks and improve our practices, PAM Group 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
- 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 PAM Group 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.

13. External Standards and Reporting Alignment

PAM Group'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.

Definitions & Acronyms

Term	Definition
Modern Slavery	An umbrella term covering slavery, servitude, forced or compulsory labour, and human trafficking, as defined under the Modern Slavery Act 2015.
Human Trafficking	The recruitment, transportation, transfer, harbouring or receipt of persons through force, coercion, deception or abuse of power for the purpose of exploitation.
Forced Labour	Work or service that is exacted from a person under threat, coercion, or penalty and for which the individual has not offered themselves voluntarily.
Bonded Labour (Debt Bondage)	A form of forced labour where a person is compelled to work to repay a debt, often under unfair or exploitative conditions.
Servitude	A condition where a person is significantly deprived of their freedom and is forced to provide services to another.
Whistleblowing	The act of reporting concerns about wrongdoing, including suspected modern slavery, through formal internal or external channels.
Agency Worker	An individual supplied by an external agency to work temporarily for PAM Group.
Contractor	A person or organisation engaged to provide services to PAM Group under a contractual agreement.

MSA 2015	Modern Slavery Act 2015 – UK legislation requiring organisations to prevent modern slavery and publish annual statements.

Related Documents & Policies

Reference	Location
HP 063	PAM Group LTD - Whistleblowing Policy
HP 019	PAM Group LTD – Recruitment & Selection Policy
PAM Colleague Handbook	Protected Disclosures or “Whistleblowing”. Pg 41