



Modern Slavery and Transparency in Supply Chains

Statement 2023

Our Statement on modern slavery

This Modern Slavery and Transparency in Supply Chains Statement ("Statement") is made in accordance with section 54 of the Modern Slavery Act 2015 (the "Act") for the financial year ended 31st December 2022. The Statement is made by Simplyhealth Group Limited (company number 05445654) on behalf of itself, Simplyhealth Access (company number 00183035) and Denplan Limited (company number 01981238). This Statement is reflective of our practices. (together "Simplyhealth").

This is the sixth Statement made by Simplyhealth since the Act came into force. It reports on our efforts made and steps taken to prevent and mitigate the risks of modern slavery and human trafficking in our business and supply chains, in line with the requirements of the Act.

This Statement is written in the spirit of transparency; it acknowledges that while we have progressed, we are committed to continually improving our practices.

Simplyhealth remains registered with the Home Office contact database to receive reporting guidance and resources. In reviewing our approach, we have taken the latest governmental guidance into account. This Statement is also published on the UK Government online registry.

This Statement sets out the steps that Simplyhealth continues to take to prevent modern slavery and human trafficking in our business and supply chains.

Simplyhealth continues to support the proposed changes outlined in the public consultation "Transparency in Supply Chains", these being: publication of our Statement on a central Government registry; a single reporting deadline; mandating the information to be included in our Statement; and civil penalties for failures to comply.

Our organisation structure, business, and supply chains

Who we are

Simplyhealth Group Limited is the parent company of Simplyhealth Access and Denplan Limited.

Simplyhealth Access is one of the UK's leading health cash plan provider, providing access to everyday healthcare. Simplyhealth is a trading name of Simplyhealth Access, which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Denplan develops, sells, and administers dental payment plans which are sold by dentists to their patients.

Simplyhealth's purpose is to improve access to healthcare for all in the UK. We make accessing healthcare easier for millions of people in a sustainable way that delivers long term impact.

As at 31 December 2022, Simplyhealth had circa 942 staff working across the Group (including agency staff and contractors). 98.1% of staff were employed on permanent employment contracts, 1.3% on fixed term contracts and 0.2% via approved agencies and 0.4% as contractors.

What we do

We are a healthcare provider that has been looking after the health and wellbeing of individuals, families, and businesses since 1872. Our mission is to improve access to healthcare for everyone in the UK, offering fast routes to excellent healthcare at affordable prices.

We are driven by a social purpose and reinvest our profits into new technology and innovation that will benefit not just our customers, but the wider healthcare system.

We are the UK's first Healthcare Provider to be awarded B-Corp status, in recognition of our sustainability, environmental and social responsibility credentials. Every year we earmark £1million of our pre-tax profits as donations to charitable partners.

Our approach to modern slavery governance

The statutory directors of each company within our Group are strongly committed to tackling the issue of human trafficking and modern slavery in our supply chains and have overall responsibility for ensuring that Simplyhealth complies with its legal and ethical obligations. These directors receive updates on the nature and requirements of the Act, and the impact on our Group annually.

We maintain clear internal governance structures at both operational and leadership levels. Our senior leaders (in conjunction with our procurement function) remain responsible for ensuring that we, as a business, comply with our modern slavery processes and procedures.

We continue to tackle modern slavery and human trafficking by educating and informing our employees, making clear commitments, and progressing against those commitments.

Our operations have not undergone any material change since the last Statement. Simplyhealth has ensured that our suppliers comply with the Act on an ongoing basis through the use of clear terms and conditions in supplier contracts and pre-contractual checks. As a result, there has been limited changes in our approach.

All of our policies and procedures remain under review and adaptable to any changes in risks faced by Simplyhealth.

Our supply chain

Simplyhealth currently has 467 contracted suppliers, the majority of which are based within the UK. The others are based within the EU and the U.S.A, who are predominantly IT software suppliers.

Simplyhealth continues to source goods and services for our internal operations, our business customers, and consumers from suppliers on our Approved Supplier List ("ASL").

Suppliers are added to the ASL following successful completion of Simplyhealth's standard supplier pre-contractual due diligence checks. As part of our due diligence checks on suppliers, we screen all suppliers for politically exposed persons ("PEPs"), sanctions and adverse media reports, as well as previous convictions, both during the initial onboarding process and throughout duration of the contract as deemed proportionate. By way of a checklist within our control framework, we can

evidence that appropriate procedures are in place to manage the risk of modern slavery and human trafficking.

Our suppliers are required to:

- Accept our modern slavery provisions in our standard supplier terms and conditions to ensure our suppliers manage their own supply chains in a way that matches our zero tolerance approach; and/or
- Complete and sign our Modern Slavery Act Form, which requests details regarding a supplier's arrangements to prevent modern slavery in its organisation and supply chains; and/or
- Provide us with a copy of their modern slavery policy where they are classified as larger suppliers with established policies in place. We will ensure this policy and/or the link to the relevant page on their website is saved in our system; and
- Accept our values as set out in the Simplyhealth Supplier Code of Conduct

We believe that effective procurement at Simplyhealth includes ethical, socially responsible behaviours in all supplier interactions including:

- Engagement and compliance with the Bribery Act 2010 and all other legislation relating to anti-corruption;
- Engagement and compliance with the Modern Slavery Act 2015;
- Engagement and compliance with outsourcing regulatory requirements;
- Commitment to diversity and inclusion; and
- Avoidance (or declaration) of any conflict of interest.

Our approach to risk management and due diligence

Our procedures help minimise and mitigate against the risk of modern slavery occurring within our business and supply chains.

We conduct thorough evaluations prior to onboarding suppliers to ensure that we identify any areas of concern. These evaluations provide assurance that we are mitigating the risk of modern slavery and human trafficking occurring in our business or supply chains.

Despite our business being self-assessed as low risk in respect of modern slavery and human

trafficking, we repeatedly assess the risk of such practices occurring in our business and our supply chains through our procurement processes.

We review and amend our processes having reference to Home Office guidance to ensure that best practice is followed in relation to modern slavery and human trafficking.

We continue to rely on some outsourced services and are aware that there are modern slavery and human trafficking risks in these supply chains.

Our procurement function undertakes proportionate due diligence on all new suppliers regardless of size or global presence, and periodically reviews these suppliers. It is hoped that by compliance with, and promotion of the Act, we will play our part in influencing all suppliers in the way they manage their supply chains.

Our policies

Simplyhealth's policies define how we run our business in a purpose and values-led way, helping us to mitigate risks and ensuring that we remain compliant with legal and regulatory requirements.

Our training, guidance and principles relating to modern slavery and human trafficking

We recognise that we have a responsibility to ensure all employees remain vigilant to modern slavery and trafficking. We deliver mandatory e-learning training modules annually and use these as a way of reminding employees of how to raise any concerns.

We continue to provide guidance to our employees regarding our corporate duties and our expectations in relation to employee action and awareness. The training and guidance we provide includes links to the Modern Slavery Helpline website, the government modern slavery website and this Statement, together with information regarding internal communication and reporting. This guidance is reflective of our zero-tolerance approach.

All employees within our procurement function undergo training to ensure that they have a full understanding of the issues affecting Simplyhealth's business and its supply chain in relation to modern slavery and human trafficking.

Our legal function has a full understanding of the impact of modern slavery and human trafficking, together with the need for our business to closely adhere to the Act, with a purposive approach, not merely at a compliance level. Our legal team ensure that our supplier due diligence and standard terms and conditions are fit for purpose.

Ultimately, we believe that our strength is in our employees and their vigilance will ensure successful engagement.

The following supplementary principles, practices and toolkits are also available to all employees to help protect against and tackle modern slavery:

- Running our Business – we have a Whistleblowing Policy in place to allow all employees to report any concerns about how their colleagues are treated, or to report any concerns regarding our business practices. This includes any circumstances that may give rise to a risk of, or a suspected event of, modern slavery or human trafficking. Our whistleblowing toolkit is designed to make it easy for employees to make disclosures without fear of retaliation;
- Our People – we strive for the highest possible standards of employee conduct and ethical behaviour as laid out in Our People Principles;
- Employment practice – we have in place, and maintain, policies and procedures which align to the requirements of applicable employment law;
- Apprentices – all our apprentices are paid in line with our internal pay scales, all wages exceed the National London Living Wage;
- Agency Workers – we use only specified, reputable employment agencies to source labour, and we always verify the practices of any new agency we are using (ensuring that they meet our standards) before accepting workers from that agency. Simplyhealth only works with providers who have their own robust internal audit measures to assure adherence to safe and fair modern working practices. We give clear guidance on the behaviours and actions we expect and our providers either adhere to our Terms of Business or are required to complete the Modern Slavery Act Form, therefore ensuring they adhere to the Act;

- Incident Reporting – This policy enables our employees to report an incident where something has gone wrong and there is a potential risk to our customers and/or the business; and
- Our approach to corporate social responsibility underpins how the organisation takes account of the economic, social and environmental impact of our operations

Our policies are easily accessible to our employees via our corporate intranet and are regularly promoted through inductions, online e-learning and business briefings.

Our evaluation and the year ahead

To evaluate the effectiveness of the measures we are taking, our process owners are responsible for modern slavery and human trafficking engagement, and publicising this across the Group. We have maintained a framework for organisational accountability, to allow our people, and others, to raise issues, make suggestions, voice grievances and report suspected or actual modern slavery or human trafficking. We have raised awareness internally of the risks of modern slavery and human trafficking and highlighted the requirements of the Act and its objectives, together with our procedures to ensure compliance.

We monitored the evolving situation in Ukraine by reviewing the ownership of our key clients and suppliers, ensuring that we had no exposure to Russian-owned companies and continually screen them against the OFSI sanctions list.

For the period covered by this Statement, Simplyhealth did not receive any reports of modern slavery within its business or its supply chain. Simplyhealth will discontinue business with any supplier found by the enforcement authorities to be involved in modern slavery.

Our priorities for 2023

As a business, for the year ahead, we will:

- Continue to closely monitor modern slavery legislation and prepare for anticipated amendments to the UK Modern Slavery Act 2015;
- Continue to develop our Supplier Code of Conduct and Vendor management Framework by assessing the effectiveness of our controls and investigating measures to deepen our understanding of modern slavery risk;
- Continue to monitor the evolving situation in Ukraine;
- Aim to map our supply chains for goods and services assessed as potentially higher risk, with reference to the Global Slavery Index.

Approved by the Board of Simplyhealth Group Limited on 21st June 2023.



Nicholas Potter
Chief Executive Officer



Simplyhealth is a trading name of Simplyhealth Access, which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Simplyhealth Access is registered and incorporated in England and Wales, registered no. 183035. Registered office: Hambleden House, Waterloo Court, Andover, Hampshire, SP10 1LQ. Your calls may be recorded and monitored for training and quality assurance purposes.