Modern Slavery Statement

Organisation

This statement applies to JD Healthcare and its associated brands (referred to in this statement as "the Group Organisation"). The information included in this statement refers to the financial year 2025/2026.

Definitions

The Group Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or having restriction placed on freedom of movement.

Commitment

The Group Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions of the Modern Slavery Act 2015.

The Group Organisation understands that this requires ongoing review of both its internal practices in relation to its labour force and its supply chains.

We do not enter into business with any organisation, in the UK or internationally, that knowingly engages in modern slavery, human trafficking, or forced labour. All labour used in providing our fertility, medical, and support services is obtained through legal and ethical means. We strictly adhere to – and often exceed – employment standards within the UK healthcare sector.

Organisational Structure

JD Healthcare operates as a specialist group of fertility and women's health clinics, with core services including IVF treatment, diagnostics, egg/sperm donation, cryopreservation, and advanced embryology. The Group comprises several UK-based clinics operating under distinct brand identities, supported by a central support office in London.

The organisation is governed by a Board of Directors and supported by a Senior Leadership Team, with dedicated functions in clinical operations, HR, governance, and compliance.

All operations are conducted within the UK, with clinics located across London, the Midlands, and the South East. While we do not operate facilities outside the UK, we may treat patients from overseas or engage with international suppliers for medical equipment and pharmaceuticals.

Supply Chain Structure

To deliver fertility services, our supply chain includes:

- Suppliers of medical-grade consumables (e.g. IVF culture media, pipettes, syringes)
- Pharmaceutical companies providing fertility medications and hormone treatments
- Laboratories and third-party courier services (for testing, cryostorage, and sample transportation)
- Equipment manufacturers and service engineers (e.g. ultrasound machines, incubators)
- Facilities management and outsourced cleaning services

Some suppliers operate internationally, including in the EU and North America, though primary procurement is from UK-registered companies with strong compliance reputations.

We understand that first-tier suppliers (e.g. specialist distributors) may source from global partners, so we take care to ensure robust standards are met at all levels.

Organisational Policies

JD Healthcare has the following policies that support its stance against modern slavery:

- Modern Slavery and Human Trafficking Policy
- Supplier Code of Conduct
- Recruitment and Right to Work Policy
- Clinical Governance and Compliance Framework
- Whistleblowing Policy
- Equality, Diversity, and Inclusion Policy

Assessing and Managing Risk

We consider our highest risk of exposure to modern slavery to exist in the procurement of pharmaceuticals and specialist medical supplies sourced through global supply chains. While these suppliers are regulated, there remains a risk where raw materials or components originate from regions with weaker labour protections.

In general, our exposure is considered **relatively limited** due to the regulated nature of UK healthcare, but we remain vigilant.

Steps taken to assess and manage risk include:

- Due diligence checks on suppliers during onboarding
- Inclusion of modern slavery clauses in supplier contracts
- Prioritisation of NHS-approved or ISO-certified suppliers

Due Diligence in Relation to Modern Slavery

JD Healthcare undertakes the following steps:

- Reviews and audits of supplier contracts
- Requesting Modern Slavery Statements from major suppliers
- Evaluating new supplier risk as part of our procurement process
- Conducting annual training for procurement and HR teams on ethical sourcing

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Training

Relevant teams (Procurement, HR, Compliance, and Clinic Managers) receive training on identifying and reporting concerns related to modern slavery, as well as refresher training on associated policies during induction and compliance reviews.

Monitoring and Evaluation

We monitor the effectiveness of our approach using the following key indicators:

- 100% staff trained in whistleblowing and compliance policies
- All contracts reviewed every 24 months to ensure inclusion of modern slavery clauses
- Reporting and investigating any concerns raised via our confidential reporting system

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Steps Taken in 2025/26

In line with our obligations, JD Healthcare has:

- Provided annual refresher training to all relevant staff

Modern Slavery Compliance Officer

Any concerns regarding modern slavery can be reported confidentially to HR Department, who will investigate and take appropriate action in line with our policies.

This statement is made pursuant to s.54(1) of the Modern Slavery Act 2015 and will be reviewed annually.

Date of Approval: 07/05/2025

Approved by: Bhavna Raikundalia, Head of Quality Management