

Swimmers Clinic Modern Slavery Statement

Our Commitment: This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps that **Swimmers Clinic** has taken and continues to take to ensure that modern slavery and human trafficking do not occur within our business operations or supply chain.

Modern slavery includes slavery, servitude, human trafficking, and forced labour. **Swimmers Clinic** has a **zero-tolerance approach** to any form of modern slavery. We are committed to acting ethically, with integrity and transparency, and implementing robust systems to prevent any form of modern slavery within our organisation or supply chain.

Our Supply Chain

Swimmers Clinic engages with a range of organisations to provide goods and services essential to our operations. Our supply chain includes suppliers of training equipment, facility providers, administrative services, and professional partners. We prioritise working with businesses that demonstrate ethical practices and align with our commitment to eradicating modern slavery.

We encourage small businesses to join our supply chain, fostering social and economic benefits within the communities we operate. We ensure that all suppliers meet our compliance standards, maintaining high-quality, ethical business practices.

Before engaging with new suppliers, they must complete the **Swimmers Clinic Supplier Approval Process**, which includes checks on:

- Insurance policies
- Health & Safety policies, procedures, and risk assessments
- Industry accreditations and certifications
- Staff qualifications, training, and competency
- Customer references
- History of legal proceedings, fines, or improvement notices

We are integrating **modern slavery compliance clauses** into our supplier contracts to reinforce our expectations and ethical obligations. Over time, we aim to ensure that all supplier relationships include contractual commitments prohibiting modern slavery and human trafficking.

Policies & Procedures to Combat Modern Slavery

Swimmers Clinic is committed to mitigating the risk of modern slavery through the following measures:

- Strengthening supplier vetting and performance reviews
- Ensuring all employees and apprentices receive at least the minimum wage and have the right to work

- Encouraging the reporting of concerns through a **whistleblowing policy** and ensuring the protection of whistleblowers
- Avoiding partnerships with businesses engaged in exploitative labour practices
- Training relevant staff and managers to recognise modern slavery risks in our business and supply chain
- Raising awareness among directors and senior managers to understand modern slavery risks and ensure proactive measures

Existing Policies Supporting Ethical Business Conduct

We have reviewed and updated our policies and procedures to ensure ethical and transparent business operations. Our key policies include:

- Recruitment and Selection Procedure (including the Prevention of Illegal Working)
- Equal Opportunities Policy
- Employee Terms and Conditions of Employment
- Grievance Procedure
- Payroll Management Procedures
- Supplier Approval Process (for both companies and self-employed individuals)
- Right to Work Policy
- Equality and Diversity Policy
- Whistleblowing Policy
- Employee Code of Conduct

Declaration

This statement has been approved by the **Swimmers Clinic Board of Directors** and is made pursuant to Section 54(1) of the **Modern Slavery Act 2015**.

Document last reviewed: 31st January 2025