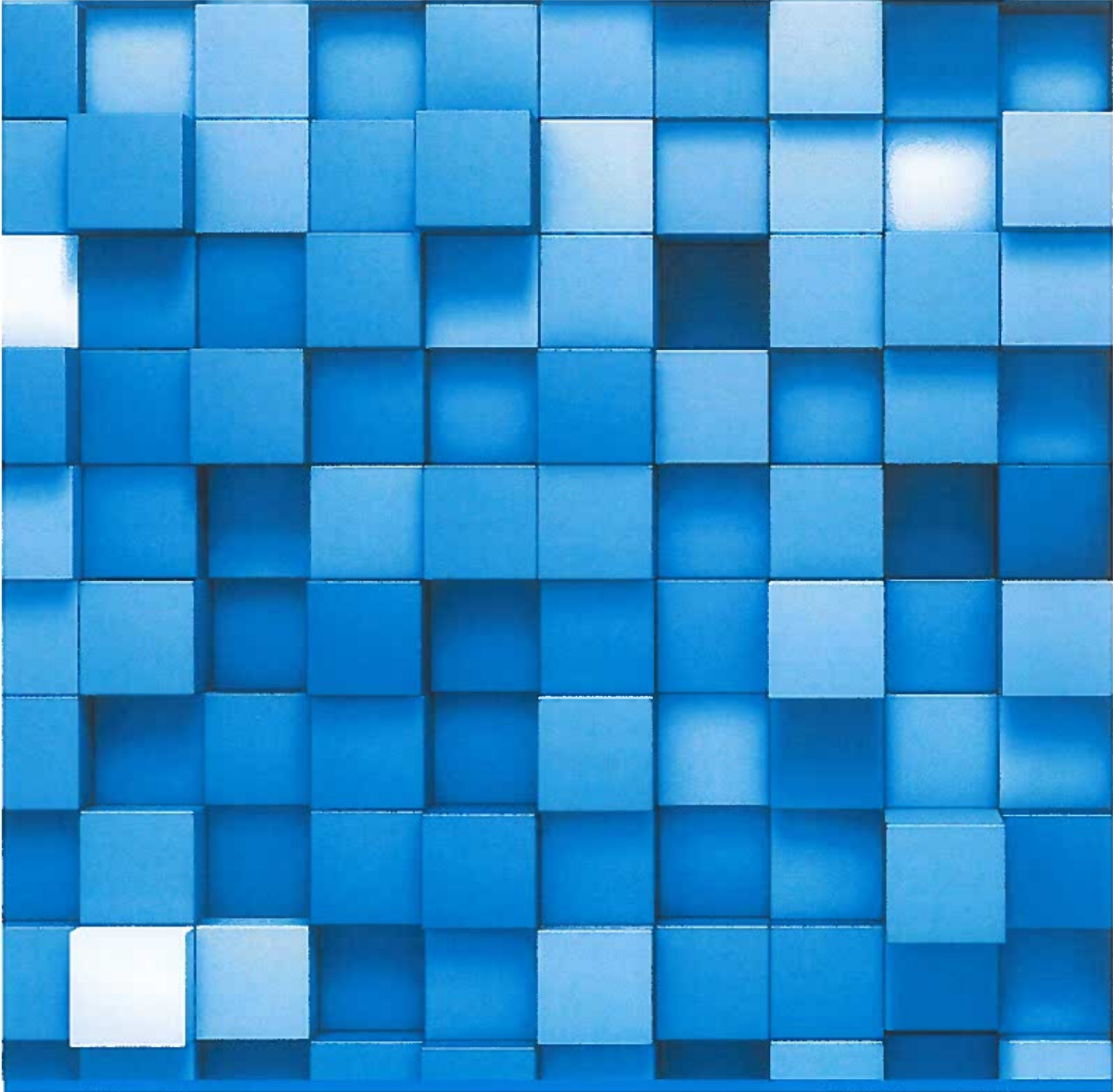


NHS Shared Business Services Modern Slavery Statement 2018



1. Introduction

This statement sets out the actions NHS Shared Business Services ("NHS SBS") has taken to understand the potential risks to its business from modern slavery and to ensure that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to the financial year ending 31 December 2016.

NHS SBS recognises that it has a responsibility to take a robust approach to preventing slavery and human trafficking.

NHS SBS is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

2. Organisational structure and supply chains

This statement covers the activities of NHS Shared Business Services Limited. NHS SBS is based in Bristol, Leeds, Salford, Sheffield, Witham, Huntingdon and Southampton in the United Kingdom and is part of the Sopra Steria Group based in Paris, France.

NHS SBS is a joint venture between the Department of Health and Sopra Steria Ltd founded in 2004. NHS SBS is the UK's leading provider of business support services to the NHS in England, working with over a third of NHS Provider trusts and 100% of NHS Commissioning organisations.

Our mission is to deliver £1 billion of savings back to the NHS by 2020 and we have already delivered audited savings of almost £650m to our NHS clients.

Sopra Steria is a European leader in digital transformation, providing one of the most comprehensive portfolios of end-to-end service offerings in the market: Consulting, Systems Integration, Software Development and Business Process Services.

With 42,000 professionals in over 20 countries Sopra Steria is trusted by leading private and public sector organisations to deliver successful transformation programmes that address their most complex and critical business challenges.

Combining high quality and high performance services, added value and innovation, Sopra Steria enables its clients to make the best use of information technology.

NHS SBS supplier chains primarily comprise organisations within the UK or Europe and we do not normally operate outside these countries. NHS SBS avoids contracting with suppliers or subcontractors located in areas where there is a higher risk of slavery and human trafficking than there is in the UK or Europe.

However, we recognise that our upstream supply chain does include countries with a higher risk of modern slavery or human trafficking, and we expect our suppliers to prevent and avoid slavery and human trafficking in their supply chains in higher risk countries. We also recognise that slavery and human trafficking does occur in the UK and Europe.

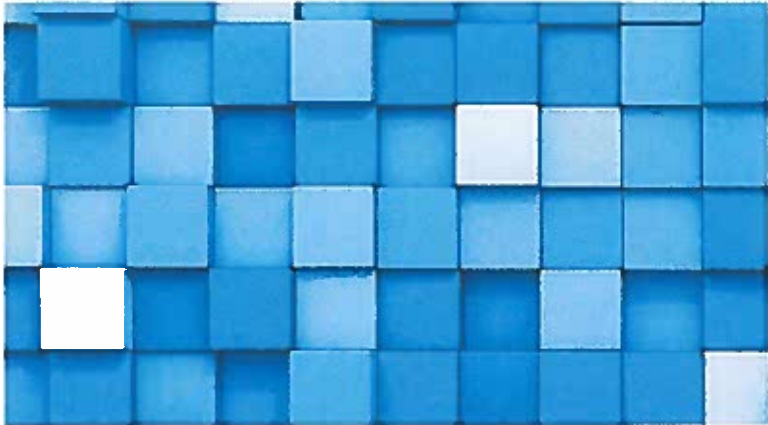


Two companies in the Sopra Steria Group are suppliers to NHS SBS Limited as well as to other companies: Sopra Steria Recruitment, which provides recruitment services and Sopra Steria India, which provides IT and business process services. Sopra Steria Recruitment is based in the UK, Sopra Steria India is based in India.

3. NHS SBS's approach to preventing slavery and human trafficking

3.1 Relevant policies

- Code of Ethics - applicable to all NHS SBS and Sopra Steria employees including those in India, the Code of Ethics describes our commitment to the 10 principles of the UN Global Compact, including fighting against child labour and exploitation, forced labour or any form of compulsory labour.
- Business Integrity Policy - it is important to NHS SBS that any fraud, misconduct or wrongdoing by workers or officers of the Company that would threaten the integrity of the business, including any actions that might raise the risk of slavery or human trafficking, is reported and properly dealt with. The Company encourages all employees to raise any concerns that they may have about the conduct of others in their business dealings on behalf of the Company or about the way in which the business is run, using the procedures outlined in this policy.
- Sustainable Procurement Policy - this policy applies to all procurement activity in the UK and requires NHS SBS to adhere to social and ethical standards and human and labour standards in the procurement of goods and services. Our standard terms and conditions for suppliers also require suppliers to uphold human and labour rights and (in the UK) to prevent slavery and human trafficking in their own operations and supply chains.
- Policy for Recruitment/Agency workers - NHS SBS uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers from that agency. In the UK, a requirement to comply with the Modern Slavery Act 2015 will be contained in our updated supplier contracts and existing suppliers will be required to comply on renewal.



3.2 Processes and practices

3.2.1 Within our own operations

Adherence to relevant employment legislation promotes human rights and largely prevents modern slavery. NHS SBS has a responsibility to ensure that workers are not being exploited, that they are safe at work and that relevant employment, health and safety and human rights laws are adhered to.

A suspected case of slavery or human trafficking within the Company's own operations should be raised using the procedures outlined in the Business Integrity Policy.

Due Diligence: NHS SBS takes the following steps to ensure there is no slavery or human trafficking within its own operations:

- All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave the Company's employment. Employees are free to serve notice at any time.
- The Company carries out verification of an employee's identity and ongoing right to work in the UK and does not seek to withhold any of an employee's identity documents or passport etc.
- The Company pays all its employees at least the Living Wage Foundation wage and adheres to all legislation in respect of working time and statutory time off, providing for minimum amounts of holiday, time off for personal emergencies, sickness and maternity/paternity leave and minimum rest breaks and periods.

3.2.2 With our supply chain

NHS SBS recognises that our supply chain contributes the greatest risks for Slavery and Human Trafficking and as such our relationship with the supply base is a critical part of our commitment to eliminating modern slavery. NHS SBS annually procures around £17.66M of goods and services through its supply chain, of which 99% is with organisations in the UK, 1% with companies within the European Union and North America.

Key categories of spend comprise -

- IT and Telecom equipment
- Consultancy and Contractors
- Travel and General Services spend including Hotels and Airlines

NHS SBS undertakes robust due diligence when taking on all new suppliers, and regularly reviews its existing supply chain.

The company uses a Sustainability Risk Matrix, which covers more than a dozen key sustainability risk areas and determines levels of risk by supply category. Using the Sustainability Risk Matrix we broadly map the supply chain to assess particular products or geographical risks of modern slavery and human trafficking. We identify suppliers in categories of supply with higher levels of risk, and with which we maintain a spend above a certain threshold, and invite them to participate in our supplier engagement process, which includes a more thorough assessment of their sustainability management processes, including those for the prevention of slavery and human trafficking.

We are continually making improvements to our ongoing monitoring and assessments of suppliers and work closely with key suppliers to share best practice and provide opportunities to build open discussions and improve existing safeguards.

- Suppliers with higher overall sustainability risk scores must provide detailed information on their human rights policies and processes, both within their own organisation and their supply chain.
- The supplier onboarding process incorporates a sustainability assessment of every new supplier where they have to provide evidence of sustainability processes and policies.
- During the last twelve months we have implemented a programme to ensure that all suppliers must confirm their acceptance of our Supplier Code of Conduct, which prohibits slavery and human trafficking, and requires them to take proactive steps to ensure that slavery and human trafficking do not occur in their operations or supply chains.
- We assist suppliers to help improve their practices, including providing advice and guidance on best practice, working with them on implementing action plans for improvements.
- NHS SBS has a policy of invoking sanctions- including the termination of business relationships or contracts - against suppliers that fail to improve their performance in line with an action plan or seriously violate our terms and conditions.



3.3 Training and awareness-building

Employees who have roles dealing with suppliers, such as the Procurement Team, attend regular training sessions to help them understand the risks of human trafficking and how to spot potential dangers through both the initial supplier onboarding process and subsequent suppliers' reviews and assessments.

All managers are responsible for ensuring that employees of NHS SBS are aware of the risks and signs of slavery and human trafficking, and of the Company's responsibilities under the Modern Slavery Act 2015.

4. Performance indicators

NHS SBS has established the following key performance indicators (KPIs) in response to the introduction of the Modern Slavery Act 2015. These Indicators effectively establish the activities the Company plans to carry out according to the timescales below. The Indicators and activities are reviewed at least annually.

- Incorporating into our standard purchasing terms and conditions the requirement for suppliers to work to prevent slavery and human trafficking.
- Maintaining our procurement risk matrix and assessment process that includes slavery and human trafficking, in order to assess the risk areas of our supply base on an ongoing basis, expanding this to cover a greater number of suppliers.
- Integrating the topic of slavery and human trafficking into our supplier engagement processes for sustainability.

5. Responsibility

Responsibility for NHS SBS's initiatives addressing slavery and human trafficking are as follows:

5.1 Policies

Responsibility for policies is:

- Human Resources – Director of Human Resources - NHS SBS for policies related to the prevention of slavery and human trafficking in our own operations.
- Chairman Sopra Steria Group SA (France), for the Sopra Steria Group Code of Ethics
- Procurement – Chief Procurement Officer - Sopra Steria Limited for policies related to the prevention of slavery and human trafficking in our supply chain and for the Sustainability Risk Matrix.

5.2. Risk assessments

Our Sustainable Procurement Lead conduct risk assessments as part of our Sustainable Supply Chain Management programme.

5.3. Due diligence

In our own operations, the Human Resources team are responsible for ensuring that the Company adheres to all employment law in the due diligence checks undertaken during different stages of employment, from initial recruitment onward.

In our procurement and supply chain management activities, the Company's Procurement Management team are responsible for undertaking due diligence activities and for such activities related to slavery and human trafficking they take input from other parts of the business, including Legal, HR and Sustainability.



6. Board approval

NHS SBS Board of Directors has approved this statement for the Financial Year ending on 31st December 2018.

Director's signature:

Director's name:

[Handwritten signature]
GAVINDER S. AHLUWALA