



## Slavery and Human Trafficking Statement

### Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015 (the "Act").

### Organisation structure, business, and supply chains

Pioneering the fertility sector for 35 years, TFP Fertility Group is one of the leading fertility services providers across the United Kingdom, Poland, and Netherlands with a network of 11 fertility clinics supported by 16 satellite clinics.

We have long been established as a leading source of expertise in many aspects of reproductive health and regularly share best practice between clinics to deliver the absolute best chance of success to our patients.

### Policies and risk assessment

TFP Fertility Group commits to taking a robust approach to reduce the risk of modern slavery occurring within our business or its supply chains and meeting the requirements of the "Act".

We expect all our staff and suppliers to abide by all applicable laws and regulations and maintain the highest ethical standards. All staff are required to prove their eligibility to work, and DBS checks are carried out where applicable. Our supply agreements and contracts include provisions requiring them to comply with applicable laws and regulations, including as relates to services, products or materials being supplied.

We commit to:

- Ensuring that our staff are aware of the risk our business faces from modern slavery by incorporating training on this policy within the staff induction process and providing regular training as necessary;
- Assessing the risk of modern slavery and human trafficking occurring within a third-party supplier prior to entering any business relationship (or in the event that something changes);



- Encouraging openness amongst our staff and suppliers and support anyone who raises genuine concerns regarding measures taken to be compliant with the Act;
- Being transparent with respect to the steps we are taking to meet obligations under the Act and publish a modern slavery and human trafficking statement within six months of the end of each financial year; and
- Review measures taken to be compliant with the Act on a regular basis and notify third-party suppliers of any changes.

As part of our initiative to identify, assess and mitigate risks, we use a risk-based assessment process for evaluating, verifying and selecting direct suppliers during the formal process of tendering and evaluating suppliers. This process includes the completion of appropriate due diligence.

### **Measuring effectiveness**

We have implemented measures to ensure that due diligence is conducted annually and that our suppliers, and the supply chain, still have the necessary policies and monitoring in place, thus ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. We tailor appropriate remedial action on a case-by-case basis should there be any instances of non-compliance.

### **Communication and awareness of this statement**

Training on this policy, and on the risk the business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training is provided as necessary.

Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

TFP Fertility Group continues to assess and evaluate its supply chains responsible sourcing practices. We strive to enforce best practices in our supply chain and across the entirety of our organisation.

A handwritten signature in black ink, reading 'Jude Fleming', written over a horizontal line.

Jude Fleming, CEO, TFP Fertility Group

Date: 18<sup>th</sup> [September](#) 2025