

# Modern Slavery Act Statement

## Introduction

Alliance Medical Limited is owned by Alliance Medical Group Limited which is ultimately owned by iCON Infrastructure LLP (iCON), a limited liability partnership incorporated and registered in England and Wales.

This statement is made by Alliance Medical Group, on behalf of the UK legal entities (“UK Entities”) which are

Andromeda Holdco Limited, Andromeda Midco Limited and Alliance Medical Acquisitionco Limited (“AMAL”) are the UK holding companies for a group of companies that operate in several countries including the UK.

Andromeda Holdco Limited, Andromeda Midco Limited and Alliance Medical Acquisitionco Limited do not trade themselves; the business in the UK is operated through its subsidiary companies set out below:

Alliance Medical Limited (“AML”),

Alliance Medical Radiopharmacy Limited (“AMRL”)

Alliance Medical Leasing Limited (“AMLL”)

Alliance Medical Holdings Limited (“AMHL”)

Alliance Diagnostic Services Limited (“ADSL”)

Alliance Medical Diagnostic Imaging (Northern Ireland) Limited (“AMDI”)

and

Lodestone Patient Care Limited (“LPC”).

Together (“**the UK Entities**”)

## UK Business Overview

Established in 1989, AML is a trusted NHS partner in the UK, an award-winning provider of community diagnostic centres and holders of the national contract for PET-CT in England; as well as offering a comprehensive private patient provision worldwide.

With 12 radiopharmaceutical production facilities and an investment exceeding £100 million in PET-CT, Alliance Medical Radiopharmacy Limited stands at the forefront of advanced diagnostic solutions and manufactures and distributes radiopharmaceutical products which are used in conjunction with the diagnostic imaging services. Alliance Medical Leasing Limited

purchases scanning equipment that is used by AML at certain sites to provide its diagnostic imaging services and is the principal contracting party for construction and development contracts for certain new sites. Alliance Medical Diagnostic Imaging (Northern Ireland) Limited are providers of outsourced diagnostic imaging services in various locations in Northern Ireland, in both the public (National Health Service (NHS) in Northern Ireland) and private sectors and have major contracts with several large insurance providers.

The UK Entities work collaboratively with clinicians, public and private healthcare organisations, and academic institutions to provide high quality and cost-effective diagnostic imaging services and radiopharmaceuticals to its customers and for its patients.

The UK Entities' supply chain includes procurement of scanning equipment and associated information technology equipment, transportation of mobile scanning units and radiopharmaceuticals, engagement of agency staff, procurement of medical and non-medical consumables, and construction and maintenance of buildings. Many of the radiopharmaceuticals are manufactured within the Group by UK Entities.

The UK Entities employ around 1400 people within the diagnostics, manufacturing and support functions. The workforce contains medical professionals as well as support staff. Medical professionals are either contracted through specialist agency providers or are recruited directly by AML. We have rigorous processes to check the background and right to work of our employees whatever role they play within the business.

Outside of the UK the Alliance Medical Group operates in Ireland, Germany, Poland, Spain, Italy and Saudi Arabia.

The products which are sourced to provide diagnostic imaging services and radio pharmaceuticals are supplied by large multinational manufacturers of this specialist equipment.

## **Commitment**

The UK Entities are committed to combatting the real and growing problem of modern slavery and human trafficking.

Recognising that it can affect any sector or industry, we take seriously our responsibility to be alert to the risks, however small, in our business and in our wider supply chain.

Our expectation is that our people and our suppliers share our commitment to ensuring modern slavery and human trafficking do not exist in our business or supply chains.

## **Our Policies**

Employment policies and procedures throughout the UK Entities are designed to treat all individuals who work within our businesses with dignity and respect, to reward them fairly for their work and not to exploit them.

Our commitment is to work with organisations in our supply chains that have a commitment to combatting modern slavery and human trafficking and adhere to our values.

Whilst it is the obligation of those organisations to operate their own policies and procedures to achieve that objective, we will develop and build upon our existing practices to ensure we take all reasonable steps to verify compliance by all our material suppliers with the provisions of the various legislation which applies to our business including the Procurement Act 2023 and the National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025 , including requesting new and existing suppliers to sign up to our Supplier Code of Conduct.

Supplier due diligence will be managed by checking suppliers through an appropriate service provider for any fines or indiscretions and we are developing a supplier questionnaire to focus on their approach to Modern Slavery which will be aligned to the questions which are required by our NHS customers and partners.

Other relevant policies include employment policies prohibiting any threat of violence, harassment and intimidation which includes a Freedom to Speak Up Guardian appointed within our business. We also prohibit any form of compulsory overtime and child labour.

## **Assessment of Risk within our Supply Chain**

A high-level assessment of our supply chains and the potential for slavery and human trafficking has been completed. Around 75% of our suppliers are based in the UK, and many are operating in specialised rather than low skilled industries and pose a lower risk in terms of modern slavery

However, we recognise that some of our suppliers operate in sectors that are potentially higher risk and that some services may involve relatively high levels of contracted labour (for example textiles relating to staff uniforms).

We are aware that under the National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025, there are additional requirements on contracting authorities to assess and understand their supply chain and associated risks, and we will ensure that we are able to provide the relevant information to our NHS partners by managing a comprehensive up to date list of our supply chain partners together with their suppliers which will be available to our NHS customers when required. Additionally, we will manage risk by carrying out appropriate due diligence on all suppliers and where there is a higher risk level, we will ensure that our contracts contain appropriate provisions to manage the risk.

We continue to periodically review and re-assess modern slavery risks and are committed to procuring goods and services in a manner which recognises the importance of human rights; we expect all our suppliers to honour and observe the same principles.

If there is evidence that a supplier is non-compliant with our policies and contractual requirements, we will take action to address the shortfall, either through a performance improvement plan or, ultimately, through termination of contract.

There have been no incidents of modern slavery found within our supply chain.

## **Actions taken in the last 12 months**

- We have taken action to integrate our Supplier Code of Conduct within our procurement process, and this Code of Conduct will be reviewed and revised during 2026 to ensure that it covers all legislative developments.
- A review of the existing training provided to employees as part of the employee Induction Programme related to Modern Slavery has been undertaken and employee training needs assessed, as a result we will be including a module on Modern Slavery in our required induction training where relevant and this will be revisited on an appropriate period depending on changes in the law and practice.

## **Actions to be undertaken in the next 12 months**

- To continue to re-assess the risks posed to the business in connection with the Modern Slavery Act.
- To review and monitor developments and proposed changes to the Modern Slavery Act in accordance with the businesses' compliance programme.
- To implement a process of due diligence on suppliers to include appropriate checks and due diligence questionnaires which include modern slavery questions.
- To implement the changes which will be required under the National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025 to enable our NHS partners to fully understand our supply chain.
- To roll out a digitised mandatory training module covering the provisions of the Modern Slavery Act for all appropriate employees.
- To provide additional training on modern slavery and the new NHS legislation to the business's procurement, finance, and HR teams as well as to all senior leaders within the business.

- To ensure risk assessments are carried out and where appropriate manage these risks contractually with suppliers.
- To continually review the provisions of the Modern Slavery Act as well as any guidelines and requirements as applicable to our business activities.

## **Approval by the Board of Directors**

The Board of Directors of AMGL has approved this statement for the financial year ending 30 September 2025

**Nick Burley**– Chief Executive Officer Alliance Medical Group Limited

March 2026