better

Modern Slavery and Human Trafficking Statement

2026–2027

Statement covering the period	1st September 2026 – 1st September 2027
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Approved by	Tomaž Gornik
Title	CEO, Better d.o.o.

Prepared with reference to the UK Procurement Act 2023 (including PPN 009: Tackling Modern Slavery in Government Supply Chains) and section 54 of the Modern Slavery Act 2015.

1. Statement of Commitment

Better takes an uncompromising position on modern slavery, forced labour, child labour and human trafficking. This statement sets out the steps Better d.o.o. trading as Better ("Better", "we", "our"), has taken and continues to take to understand and address modern slavery risk in our own operations and in our supply chain.

This statement also extends across Better Ventures and Better Ltd.

Better is a digital health technology company that supplies electronic patient record, electronic prescriptions and medication management (ePMA), shared care record and related software solutions to health and care organisations, including NHS Trusts and Integrated Care Boards across the UK. We recognise that as a supplier operating in and around the NHS, our buyers rightly expect the same standard of ethical conduct from us that they expect within their own organisations and supply chains.

Leadership commitment

"We recognise the importance of our attitude towards the people who make our business, and our customers' businesses, possible — wherever they sit in the supply chain. Ethics by design means we build these commitments into how we operate, not just how we report on it." — **Tomaž Gornik, CEO, Better**

"Governance, transparent decision-making and responsible supplier management are core to how Better protects the interests of our employees, our customers and our partners." — **Roland Petek, Chief Operating Officer, Better**

This statement is approved by Better's leadership and will be reviewed and updated at least annually.

2. About Better

Company: Better d.o.o. trading as Better

- **Registered office:** Štukljeva cesta 48, 1000 Ljubljana, Slovenia
- **Company Registration Number /Business ID (matična številka):** 8505047000
- **LEI code:** 9504005C6A5N58BG2357
- **UK address:** Capital Quarter No.4, Tyndall Street, Cardiff, Wales, CF10 4BZ (Better Limited, Company Registration Number 12348524)
- **Ireland address:** 3rd Floor, 40 Mespil Road, Dublin 4, Dublin, D04 C2n4, Ireland (Better Ventures Limited ,Company Registration Number 661544)
- **Website:** www.better.care

Better is an international digital health platform business headquartered in Slovenia, with delivery teams and a UK presence supporting our NHS customers directly. Our open, standards-based platform (built on openEHR and FHIR) underpins solutions including Better Meds (ePMA), Shared Care Record, PROMs and Care Coordination, supporting over 1,000 connected healthcare institutions and 40 million+ patient records worldwide, including long-standing NHS relationships such as The Christie NHS Foundation Trust, Oxford University Hospitals, Somerset NHS Foundation Trust, Wye Valley NHS Trust, South London and Maudsley NHS Foundation Trust and OneLondon.

3. Our Position on the Statutory Threshold

Below threshold — statement published voluntarily

Section 54 of the Modern Slavery Act 2015 requires commercial organisations with a global annual turnover above £36 million to publish an annual slavery and human trafficking statement.

Better's current turnover sits below this £36 million threshold, meaning publication of this statement is not a strict legal requirement for us.

Better chooses to publish this statement voluntarily, because we believe our NHS and public sector customers should not have to take our commitment to eliminating modern slavery on trust. We choose to be transparent about our size and be judged on the substance of what we do, than rely on a turnover threshold to avoid scrutiny.

We also recognise that, independent of the section 54 turnover test, the Procurement Act 2023 already treats Modern Slavery as a live procurement risk for suppliers of any size: convictions for certain Modern Slavery and Human Trafficking offences are a mandatory exclusion ground under Schedule 6 of the Act, and evidence of modern slavery without a conviction can be a discretionary exclusion ground.

Better's policies and due diligence set out below are designed to give buyers confidence on both counts — legal compliance and genuine ethical practice — regardless of the size test that technically discounts us.

4. Our Policies

Better's commitment to preventing modern slavery is embedded in a framework of Board-approved policies that apply to all employees, contractors and, through the contractual clauses described in Section 6, our suppliers and subcontractors:

- **Zero Tolerance Policy —** no forced labour, bonded labour, child labour or human trafficking is tolerated anywhere in our business or supply chain, and any confirmed instance results in termination of the relevant relationship and, where appropriate, referral to the relevant authorities.
- **Equality Policy —** all employees receive fair wages, safe working conditions and the right to raise concerns without fear of reprisal.
- **Ethics by Design Policy —** ethical considerations, including human rights and labour standards, are built into the design, development and deployment of our products and our supplier relationships, not treated as an afterthought.
- **Code of Conduct —** sets out the standards of conduct expected of employees, partners and stakeholders, including on anti-bribery, anti-corruption, fair dealing and non-discrimination.
- **Whistleblowing / Speak-Up Policy —** a confidential channel, aligned with the EU Whistleblowing Directive (2019/1937), through which employees, contractors and supply chain workers can raise concerns — including about modern slavery — without fear of retaliation.
- **Anti-Bribery and Anti-Corruption Policy —** prohibits offering, giving or receiving bribes or improper advantages, reducing the financial incentives that can sit behind labour exploitation in supply chains.

5. Due Diligence, Risk Assessment and Training

5.1 Risk assessment

Better's own operations are software design, development, implementation and support — a comparatively low-risk activity for modern slavery. We consider our principal exposure to sit further down the supply chain: in hardware and infrastructure procurement, facilities and office services, recruitment/staffing agencies, and any offshore or subcontracted development or support arrangements. We prioritise due diligence effort, accordingly, using the risk tiering set out in Section 6.

We also apply this thinking to our own international workforce, not only to suppliers. Better is headquartered in Slovenia, with a UK presence supporting our NHS customers directly. Independent country risk assessments identify Slovenia, in common with other countries in the wider region, as a transit route for individuals trafficked into Western Europe for forced labour and sexual exploitation. This does not mean our own operations are implicated — but it is a genuine reason for us to hold our own recruitment, onboarding and pre-employment checks, in Slovenia, the UK and elsewhere, to a high standard, and we treat it as such rather than assuming risk sits only with suppliers.

5.2 Recruitment safeguards and induction

Our own recruitment practices are designed to reduce modern slavery risk at the point someone joins Better, wherever in our operations they are based:

- **Pre-employment checks —** verification of the right to work, identity documents, employment history and professional references before an offer is confirmed.
- **Background checks —** criminal record checks (DBS in the UK, or the equivalent in other jurisdictions in which we operate) are carried out where appropriate to the role.
- **Direct payment —** workers are paid directly, on time, and in line with national minimum/living wage requirements in their jurisdiction, reducing the conditions that create dependency on unauthorised intermediaries.
- **Induction on workplace rights —** all new starters, in the UK and overseas, receive an induction covering their employment rights, terms and conditions, and how to raise a concern.

5.3 Training and awareness

We educate our people so that modern slavery risk is something they can recognise, not just a policy on a shelf:

- **Induction training —** all employees complete modern slavery awareness training as part of induction, with a target completion window of two weeks from joining, alongside training on the Code of Conduct, whistleblowing and ethical business conduct. This training is to be repeated every year.
- **Targeted training —** procurement, HR, sales and bid teams who negotiate contracts, select suppliers or respond to public sector tenders receive additional briefing on modern slavery indicators and the questions to ask of suppliers and labour providers.
- **Ongoing refresh —** guidance and case examples are refreshed to reflect changes in UK procurement law, including the Procurement Act 2023 exclusion regime.

5.4 Worker voice and grievance mechanisms

Identifying modern slavery depends on people being able to raise concerns safely, so we provide more than one route to do so:

- **Worker representation —** UK staff have access to information on independent worker representation and trade unions through their staff handbook.
- **Whistleblowing and escalation —** employees and, through Section 6, our extended supply chain can raise a concern — including a suspected instance of modern slavery relating to a Better contract — through our confidential whistleblowing channel, with a defined escalation route through to leadership.
- **Safeguarding response —** our safeguarding policy sets out how a suspected incident is handled, including cooperating with the police and victim support organisations where appropriate.

5.5 Effectiveness

We assess the effectiveness of these measures through completion rates for mandatory training; the number and nature of concerns raised through our whistleblowing channel; the proportion of active suppliers with a current signed Supplier Code of Conduct or equivalent attestation on file; and outcomes of any supplier audits or reviews (see Section 8).

6. Our Supply Chain

Better's supply chain is relatively contained compared with a manufacturing or logistics business, but it is not trivial, and NHS buyers are right to ask how we manage this. Our principal categories of supplier and third party spend are:

- **Cloud hosting and infrastructure —** public cloud, data centre and network providers supporting our software platform.
- **Software and technology subcontractors —** third-party software components, integration partners and specialist development or QA subcontractors.
- **Hardware and IT equipment —** workstation, network and peripheral equipment for our own staff.
- **Recruitment and staffing agencies —** recruitment agencies and contingent/contract staffing used to flex delivery capacity.
- **Facilities and corporate services —** office facilities, cleaning, catering and travel services supporting our own premises.
- **Professional services —** consultancy, legal, audit and marketing support.
- **Hotel and catering services –** use of hotels and restaurants while our team are working away from their offices in the UK.

We recognise that risk is not evenly spread across this list. Recruitment/staffing agencies, facilities services, and hardware supply chains (which can extend into manufacturing and raw material extraction beyond our direct visibility) are generally regarded as higher modern slavery risk categories than professional or cloud services, and we weight our due diligence accordingly.

6.1 How we manage and monitor suppliers today

- **ISO 20000 Clause 8.3 supplier governance —** Better's ISO 20000 IT service management certification requires documented supplier agreements, a designated responsible owner for each supplier, and ongoing performance monitoring against service targets. We extend this same governance discipline — not just its IT-service-management purpose — to cover modern slavery and ethical sourcing expectations for in-scope suppliers.
- **Contractual clauses —** standard contract terms with suppliers and subcontractors include compliance with modern slavery and human trafficking legislation, a right for Better to audit or request evidence of compliance, and a right to terminate for confirmed breaches.
- **Supply chain mapping —** we identify our tier 1 suppliers (those we contract with directly) and, where visible to us, tier 2 (their key subcontractors), noting the type of work, the workforce profile and the country or region involved, so that higher-risk points in the chain — rather than the chain in the abstract — get our attention.
- **Supplier awareness —** suppliers and stakeholders are included in our modern slavery awareness activity so that expectations are communicated, not just contractually implied. Larger suppliers have also published their own Modern Slavery Statements on their own company websites.
- **Ethical supplier selection —** we use the Committee on Standards in Public Life's ethical standards and the NHS Counter Fraud Authority's Supplier Code of Practice as reference points when structuring supplier selection for NHS contracts, so the process itself resists the bribery, corruption and cost-cutting pressures that can drive labour exploitation further down a supply chain.
- **Hotel and catering services –** we use independent hotels and restaurants where possible while our team are working away from their offices in the UK.

6.2 Steps to strengthen supplier assurance

The following actions are proportionate, low-cost extensions of what Better already does, and are the practical steps we can point NHS buyers to when asked how we will keep improving supply chain assurance over the life of a contract:

1. Supplier Code of Conduct on onboarding — issue a short, plain-English Supplier Code of Conduct (covering forced/child labour, wages, working hours, freedom of association and right to raise concerns) for all suppliers to sign as a condition of onboarding and contract renewal.

2. Risk-tiered due diligence — apply a simple risk tier (e.g. low / medium / high) at onboarding based on category (staffing, facilities and hardware suppliers default to medium/high; cloud and professional services typically low), and scale due diligence effort to the tier rather than treating every supplier the same.

3. Self-assessment questionnaire (SAQ) — a short self-assessment questionnaire (SAQ) for medium/high-risk suppliers covering: do they have a modern slavery policy; how do they verify workers' right to work and identity documents; how are wages paid and to whom; do they use sub-agencies, and if so how are those vetted.

4. Contractual flow-down and audit rights — standard contract clauses that require compliance with the Modern Slavery Act 2015 and cooperation with reasonable audit requests, plus a mandatory "flow-down" clause obliging suppliers to apply equivalent standards to their own subcontractors.

5. Annual supplier attestation — annual (or contract-anniversary) supplier attestation confirming no known instances of modern slavery, refreshed alongside insurance and compliance certificate renewals so it doesn't create extra administrative burden.

6. Extend whistleblowing access to supply chain workers — extend Better's confidential whistleblowing channel so that suppliers' own workers can raise concerns about their employer directly with Better where they relate to a Better contract — a route that is often missing even when a policy exists on paper.

7. Targeted audit and evidence checks for higher-risk suppliers — for higher-risk categories (principally staffing agencies and hardware suppliers), periodic desk-based review of SAQ responses, with the right to request evidence or conduct a site/records review where responses raise concern, rather than assuming a blanket right of physical audit is proportionate for a company of our size.

8. Clear consequences for non-compliance — clear escalation route — remediation plan requested first, contract suspension or termination for suppliers who cannot demonstrate compliance or fail to engage — set out in the contract itself so it is not a discretionary afterthought.

9. Recognise supplier accreditation in selection — preferring suppliers who can themselves evidence relevant accreditation (e.g. Living Wage / Real Living Wage accreditation, Stronger Together membership, SEDEX/Sedex Members Ethical Trade Audit (SMETA) participation, or their own published modern slavery statement) as a positive signal during selection, not just at the exclusion-check stage.

10. Draw on external NGO/VCSE expertise — approach a specialist anti-slavery NGO or VCSE (for example Anti-Slavery International, or an equivalent regional body covering our Slovenian and wider European operations) for guidance on assessing and strengthening our supply chain approach, rather than relying solely on internal expertise.

6.3 Alignment with NHS and public sector expectations

We recognise these steps sit alongside — and support — wider public sector expectations under PPN 009 (Tackling Modern Slavery in Government Supply Chains) and, for NHS-specific procurements, emerging requirements under the National Health Service (Procurement, Slavery and Human Trafficking) Regulations. This statement is also written to align directly with PPN 002 Model Award Criteria 1e ("Identifying and managing the risks of modern slavery"), under Outcome 1: Fair Work, and with PPN 06/20 Theme 2 (Tackling Economic Inequality) and Theme 5 (Wellbeing) where this is still used — see Appendix A for a full cross-reference, to be used directly when evidencing Social Value / MAC responses.

7. Measuring Our Progress

Better track practical indicators, aligned to the standard PPN 002 / Model Award Criteria 1e reporting metrics used across NHS and public sector contracts, so this statement reflects what is actually happening, not just intent:

- number of tier 1 and tier 2 suppliers who have been audited or assessed for modern slavery risk.
- proportion of staff completing modern slavery awareness training within the target window (two weeks) of joining Better.
- percentage of active suppliers, by risk tier, with a current signed Code of Conduct or self-assessment questionnaire on file.
- number of modern slavery-related concerns raised through the whistleblowing channel, and outcomes.
- number of supplier remediation plans issued and closed out within agreed timescales.

These indicators are reviewed by leadership at least annually, alongside this statement, and will be refined as our supplier assurance programme matures. Where a specific contract procurement pack sets its own modern slavery reporting metrics or frequency, those contract-specific requirements take precedence for that contract.

8. Governance, Approval and Review

This statement has been approved by Better's leadership and constitutes our modern slavery and human trafficking statement for the period stated on the cover page. It will be reviewed at least annually, or sooner if there is a material change to our operations, supply chain or the law.

Approved by	Tomaž Gornik, Better
Role	Chief Executive Officer
Date approved	24th September 2026
Statement period	September 2026 – August 2027
Next review due	24th August 2027

9. Contact and Reporting Concerns

NHS Trusts, other public sector buyers, or anyone in Better's supply chain with a question about this statement, or a genuine concern about modern slavery connected to Better's operations or supply chain, can contact us at:

ukisocialvalues@better.care

or Better Employees can access the confidential Whistleblower portal on our Intranet.

All concerns raised in good faith are treated confidentially and without retaliation.

Appendix A: Alignment to PPN 002 / Model Award Criteria 1e

Model Award Criteria 1e ("Identifying and managing the risks of modern slavery"), sits under Outcome 1: Fair Work of the PPN 002 Social Value Model. The table below signposts where this statement addresses each element bid evaluators typically look for, to make this statement easier to cross-reference in Social Value / MAC responses.

MAC 1e element evaluators look for	Addressed in this statement
Understanding of modern slavery risks affecting the market, sector, country of origin/source, and own workforce and key subcontractors	Sections 5.1 and 6
Supply chain mapping (vulnerable groups, type of work, location)	Section 6.1
Worker access to representation, trade unions and grievance mechanisms; escalation routes; cooperation with police/victim organisations	Section 5.4
Induction on workplace rights; access to modern slavery training	Sections 5.2 and 5.3
Policies on pre-employment checks, recruitment practices, workplace conditions, safeguarding and monitoring	Sections 4 and 5.2
How requirements flow down the supply chain and are monitored (reporting, audits, etc.)	Section 6.1 and 6.2 (points 1–8)
Ensuring price, lead-time and payment decisions do not create modern slavery risk in the supply chain	Section 6.1 (ethical supplier selection) and Section 5.2 (direct, timely payment)
Working with NGOs, trade unions or other businesses on modern slavery risk	Section 6.2, point 10
Raising awareness with staff, suppliers and stakeholders; nominated organisational lead	Sections 1, 4 and 5.3
Standard reporting metrics 1ei (supplier audits) and 1eii (staff training)	Section 7

Appendix B: Reference Notes

General background of the legal and standards references used in this statement:

The section 54 turnover test

Section 54 of the Modern Slavery Act 2015 requires commercial organisations that carry on a business (or part of a business) in the UK, and that have a total global annual turnover of £36 million or more in a financial year, to publish an annual slavery and human trafficking statement. The £36 million figure is assessed on total worldwide group turnover, not just UK turnover, and includes the turnover of any subsidiaries. Better's current global turnover sits below this threshold, so publication is not a strict legal requirement for us — which is why Section 3 of this statement explains our decision to publish voluntarily regardless.

The EU Whistleblowing Directive (2019/1937)

Directive (EU) 2019/1937 requires EU member states to put in place secure reporting channels, and legal protection from retaliation (such as dismissal, demotion or harassment), for individuals who report breaches of EU law encountered in a work-related context. As an organisation headquartered in Slovenia, an EU member state, Better's whistleblowing arrangements are designed to meet the standards the Directive sets: a confidential reporting channel, a defined timeframe for acknowledging and following up on reports, and protection from retaliation for anyone who reports a genuine concern in good faith — including concerns about modern slavery.

Committee on Standards in Public Life's ethical standards

The Committee on Standards in Public Life (CSPL) is an independent UK public body that sets the “Seven Principles of Public Life” (the Nolan Principles) — selflessness, integrity, objectivity, accountability, openness, honesty and leadership. These principles are widely used as the benchmark for the conduct expected of anyone carrying out public functions, and increasingly of the suppliers and contractors who deliver services on behalf of public bodies. Better references these principles when structuring how we select and manage suppliers for NHS contracts (see Section 6.1), because a procurement process that resists corruption and undue cost-cutting pressure is also one that is less likely to create the conditions for labour exploitation further down a supply chain.

The NHS Counter Fraud Authority's Supplier Code of Practice

The NHS Counter Fraud Authority's Supplier Code of Practice sets out, specifically for NHS suppliers, the standards expected around preventing fraud, bribery and corruption in the way suppliers win and deliver public contracts. Alongside the CSPL principles above, Better uses this Code as a reference point in supplier selection and management for NHS contracts, on the basis that ethical procurement practice and modern slavery prevention are closely linked — both depend on removing the financial pressures and opacity that allow exploitation to go unchecked.

PPN 009 (Tackling Modern Slavery in Government Supply Chains)

Procurement Policy Note 009 sets out the UK government's expectations of suppliers on identifying, preventing and mitigating modern slavery risk in public sector supply chains, reflecting the exclusion grounds introduced under the Procurement Act 2023. It expects suppliers to take proportionate, risk-based action across their own operations and supply chain — mapping risk, having appropriate policies and training in place, and providing evidence of this when asked — rather than treating modern slavery as a one-off compliance exercise. Sections 5, 6 and 7 of this statement are structured to answer exactly these expectations.

PPN 002 Model Award Criteria 1e ("Identifying and managing the risks of modern slavery")

Model Award Criteria 1e is one of the standard evaluation criteria published under PPN 002, used by NHS and public sector buyers to assess a bidder's approach to modern slavery as part of the Social Value Model, under Outcome 1: Fair Work. It looks for evidence of risk understanding, supply chain mapping, worker voice and grievance mechanisms, training, and standard reporting metrics (1ei and 1eii). Appendix A of this statement cross-references each MAC 1e element directly against the section of this statement that addresses it, for bid teams evidencing Social Value / MAC responses.