

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Verity Healthcare Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

## Our Business

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We provide quality home care and have grown over the years to be a pacesetter homecare provider in England & Wales. Our business delivers comprehensive range of homecare services including academic services, dementia care, disability care, live-in care respite, and social companionship care. Currently, we offer nursing care and provides healthcare solutions which enable individuals to stay in their own homes. We provide first class care that provides choice and enhance privacy and independence of people to live comfortably in their homes.

Verity Healthcare Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. We are committed to preventing the existence of slavery or human trafficking within the organisation and all of our supply chains. To do this we have a zero tolerance policy and take all necessary steps to mitigate any potential risk.

## Our high risk areas

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We believe that the business industry in which we operate pose a reasonably low risk in regards to slavery and human trafficking, however, we have implemented this statement to demonstrate how we have fulfilled our ethical and legal responsibility to both create and implement practices which do not allow either modern slavery or human trafficking to take place.

This document encompasses our slavery and human trafficking statement for the financial years ending 2018-2020 and has been implemented in accordance with the Modern Slavery Act 2015.

## Our Policies

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We have implemented a Modern Slavery Policy which is reviewed annually by the Management Team. In addition, we have a Whistle Blowing Policy which is summarised within the Staff Handbook . All staff receive a copy of this policy as part of their training. The Handbook provides contact details of confidential helpline which can be used to report matters of serious concern, particularly in relation to Modern Slavery. Any reports will be dealt with by a senior representative from the business in a prompt and professional manner.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Anti-slavery policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. **Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. **Code of business conduct.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

We amend the Staff Handbook to emphasise how the helpline can be used specifically to report any serious disclosures or concerns, such as suspicions of modern slavery or human trafficking with the view of hoping to encourage increased reporting.

## Our Supply Chain

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Verity Healthcare Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

We have a global supply chain of external recruitment agencies to aid with our national and overseas recruitment activity. We recognise these agencies as a potential area of risk as we do not have full control over the recruitment process while it is being managed externally, but understand we have an ethical and legal responsibility to source responsible suppliers. We will be looking to mitigate the risk of modern slavery or human trafficking by contacting all suppliers and asking them for information including; if they have a modern slavery policy in place, what their company standards are in relation to the issue and what training is facilitated to develop knowledge in this area.

Furthermore, this auditing process will be completed as an annual risk assessment for all suppliers to ensure we have increased knowledge about the processes our suppliers have in place to ensure our zero tolerance approach is also adhered to by all members of our supply chain.

In addition to the above, as part of our contract with suppliers, we require that these agencies confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. For UK based suppliers, we ensure that our partner agencies pay their employees at least the national minimum wage / national living wage as appropriate.
4. For international suppliers, we ensure that the partners pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

## Due Diligence

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The company undertakes due diligence when considering taking on new suppliers, and regularly

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new suppliers
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
- Conducting supplier audits or assessments through [the Company's own staff/third party auditor], which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- Creating an annual risk profile for each supplier
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

## Performance Indicators

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The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- Requiring all staff to have completed training on modern slavery before starting work with us and those working already to complete the training by September 2016
- Developing a system for supply chain verification whereby the Company evaluates potential suppliers before they enter the supply chain; and

- Reviewing its existing supply chains, whereby the Company evaluates all existing suppliers.

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

## Training

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We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

We have incorporated training on modern slavery into the induction programme for all new carers during this financial year. The training aims to increase awareness on modern slavery and human trafficking, explains how to identify if this type of abuse is happening and what to do if you think it may be taking place.

We plan to further our employee training by rolling this out to all new staff members next year by including training on the issue into all employee inductions. In addition, all members of the senior leadership team will be briefed on the matter.

## Approval for this statement

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This statement was approved by the Board of Directors on 25<sup>th</sup> October 2018