

Modern Slavery Statement for financial year 2023/2024

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Active Care Group (ACG) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chains.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ACG 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 chains.

Our Policies

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

- 1. **Modern Slavery Policy** This policy sets out the organisation's stance on modern slavery and explains how colleagues can identify any instances of this and where they can go for help.
- 2. **Safer Recruitment Policy** We operate robust recruitment procedures, including conducting eligibility to work in the UK checks (prior to employment commencing and during employment when a re-check is required), for all colleagues to safeguard against human trafficking or individuals being forced to work against their will.
- 3. **Disciplinary Policy** We are committed to creating a culture and work environment, which is free from bullying, harassment, and victimisation, where everyone is treated with the utmost dignity and respect. The Company will not tolerate bullying, harassment or victimisation of any kind and any behaviour that undermines this aim is totally unacceptable and will be dealt with via our Disciplinary Policy
- 4. **Equality, Diversity, and Inclusion Policy** We are committed to ensuring equality of opportunity for all colleagues irrespective of age, disability, sex, gender reassignment, sexual orientation, race, religion or belief, marital status and civil partnerships and aims to ensure all that all managers, colleagues and contractors are made fully aware of the behaviour that is and is not acceptable within the business.
- 5. **Freedom to speak Up Policy** We operate a robust policy and confidential hotline to ensure all colleagues know that they can raise concerns confidentially about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- 6. **Anti-Bribery and Anti-Corruption Policy** This policy exists to set out the responsibilities of ACG and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for our business it helps them recognise and deal with bribery and corruption issues and understand their responsibilities.
- 7. **Business Conduct Policy** This policy Is intended to guide colleagues on the required standards of conduct within Active Care Group. It outlines the professional conduct expected of all colleagues.









Our Suppliers

ACG 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 requesting to see their policy in relation to Modern Slavery as part of the tender process. Our Modern 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.

In addition to the above, as part of our contract with suppliers, during new tenders we require that they 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) They pay their employees at least the national minimum wage / national living wage (as appropriate).
- 4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.

Reviews

We hold regular management meetings and reviews. We regularly check the internet for any bad news in relation to our suppliers, both during the tender process and for current suppliers.

Our performance indicators

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 colleagues, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Keith Browner

Chief Executive Officer





