

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This statement is prepared for the purposes of Section 54(1) of the Modern Slavery Act 2015 and forms our slavery and human trafficking statement for the financial year ended **5th April 2020**. Excelcare is 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 slavery and human trafficking taking place within the business or our supply chain.

This statement sets out the steps taken by Excelcare during the past financial year, to help prevent slavery and human trafficking within our business and its supply chain. Excelcare views the steps being taken as an evolving process and will continue to monitor and review its risk profile to improve and strengthen its practices going forwards.

Our Structure

Excelcare comprises the following separate and distinct entities (and their wholly owned subsidiaries):

- Excelcare (Cambridge) Limited 06276142
- Excelcare (London) Limited 06276403
- Excelcare Holdings Ltd Limited 03146902

This statement is made on behalf of all the 3 above entities (and their wholly owned subsidiaries).

Excelcare are a premier care service provider who for over 30 years has been providing exceptional residential, nursing and dementia care within our 33 care homes across the South East region of the UK. The company does not recognise a trade union.

Our company head offices are in Bromley, Kent.

Responsibility for tackling modern slavery resides with our Board along with the individuals listed below:

- Osa Ogbeide, Head of People Operations
- Samantha Crawley, Head of Business Improvement
- Jane Prior, Head of Quality, Governance & Development

Our Supply Chains

We select our suppliers and business partners carefully and, where possible, conduct due diligence on them, so that we are comfortable that we are doing business with trusted partners and, known parties, who effect business in full compliance with local law and best practice. We encourage all of our suppliers to comply with our policies, often by raising awareness of our policies as part of our procurement tender processes and/or we expect that they will have similar policies in place.

Excelcare expects all of its suppliers, contractors and service providers to act ethically and with integrity and to have in place effective systems, safeguards and controls to ensure modern slavery is not taking place anywhere in their own business or in their supply chains.

Excelcare operates and maintains preferred supplier lists. Before any new supplier, contractor or service provider is approved, Excelcare, carries out appropriate due diligence on the supplier, including requiring the supplier to submit a "Supplier Set Up Form". As part of this process, Excelcare, carries out an online search to ensure that an organisation has not been convicted of any offences, including, but not limited to, offences relating to modern slavery whether through human trafficking, slavery, child labour or otherwise.

Our Supply chains include but are not limited to the procurement of agency staff, food and beverages, medical consumables and waste management. We aim to keep our supply chains consistent and short with the majority of our suppliers being UK based.

Our suppliers of temporary agency staff to our services are expected to sign up to and agree to the terms of Excelcare Anti-Slavery Compliance Agreement in respect of agency workers, where they are required to confirm that they understand and comply with the Modern Slavery Act 2015.

Due Diligence and Risk Management

Due to the seriousness and importance of identifying and preventing the risk of slavery and human trafficking; as a company, we ensure that all third party suppliers that we enter into business with place the same high level of importance in their approach to prevent Modern slavery and human trafficking as we do we do this by ensuring new suppliers sign a contract which stipulates that they are responsible for addressing and eradicating modern slavery within their organisation and that they are to adhere to our policy and supply theirs to us.

In a bid to manage and assess potential risk factors, we have various processes and policies in place to help us protect whistle blowers, identify and mitigate potential risks of modern slavery and human trafficking within our supply chains.

Measuring Effectiveness

Excelcare uses the following measures, amongst others, to monitor and assess how effective we have been as a business at ensuring that modern slavery and human trafficking is not taking place within our business or supply chains:

- Service audits reviewing the appropriateness of existing controls.
- The use of effective labour monitoring procedures and payroll systems.

To date we have not received reports from either internal or external individuals or organisations to indicate our practices are in breach of the Modern Slavery Act 2015.

Training for Staff and Awareness

Our zero-tolerance approach is communicated to all third-party stake holders at the outset of our business relationships, reinforcing these as and when appropriate.

In our endeavour to ensure a high level of awareness on Modern Slavery and Human Trafficking, this policy, and the risk our business faces from the implications of modern slavery forms part of our induction programme for all individuals who work for us. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, contractors, external consultants, third-party representatives and business partners.

Compliance with this Policy

The importance the company places on Modern Slavery and Human trafficking runs through this document and the company expects that:

- All stakeholders must ensure that they read, understand, and comply with this policy.
- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- Employees must notify their Line Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

Failure to adhere and comply with this Policy could result in:

- Dismissal on the grounds of misconduct or gross misconduct, if an employee breaches the details set out in this policy.
- Termination of a business relationship with other individuals and organisations working with us or on our behalf, if they breach the details set out in this policy.

Osa

Osa Ogbeide

Head of People Operations

For and on behalf of Excelcare

Dated: 1st May 2020