



## Our Business

Highgate Care is a family owned, leading private provider of care facilities in the East Riding and Yorkshire area.

Key to the quality of our service provision is our commitment to the welfare of our residents and the staff that provide the care. We work with a large number of partners and suppliers all of whom have a duty to respect human rights.

## Our Position

The prevention of slavery and human trafficking across our operations and throughout our supply chain is a responsibility we take extremely seriously.

The UK Modern Slavery Act (the 'Act') has prompted us to undertake a thorough review of our policies, examine our supply chains and question the robustness of our current practices.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our business.

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

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, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners ("stakeholders").

This policy does not form part of any employee's contract of employment or an agreement with any stakeholder, and we reserve the right to amend this at any time. The Board has primary and day-to-day responsibilities for implementing this policy, monitoring its use and effectiveness and dealing with any queries.

- Management, at all levels, is responsible for ensuring those reporting to them understand and comply with this policy. They are also responsible for ensuring that staff involved in buying/procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.
- Stakeholders are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Board



Policies and Procedures to deliver compliance with the Modern Slavery Act 2015:

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

- **Anti-Slavery Policy:** sets out the Company's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help
- **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
- **Whistle-Blowing Policy:** ensures 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
- The Group will provide an annual anti-slavery statement to be published on our website. The anti-slavery policy will be reviewed annually
- Induction for all employees covers the review of this policy
- Terms of business agreed with all suppliers and contractors will include requirement for the supplier/contractor to confirm there is no slavery activity within their organisation
- We expect all our employees to be treated with respect. Our aspiration is to provide a working environment in which all employees can realise their potential, free of harassment and discrimination
- Employee awareness and engagement. We share guidance on the UK Modern Slavery Act 2015 with our procurement colleagues

We see the implementation, measurement and raising of awareness and standards across our business and supplier base as being an ongoing project. We will continue to draw on industry best practice and evolve our supply chain in the best way possible to ensure that we are continually assessing the effectiveness of preventing slavery and human trafficking.

In commencing, or continuing to, supply good or services to Highgate Care the supplier is acknowledging our position and its own commitment to prohibit the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

### Approval:

This statement has been approved by our Board of Directors on 1st September 2022 and will be reviewed and updated, where required, on an annual basis.

Richard Hoggart, Director, 1st September 2022