Modern Slavery Statement

Introduction

This statement sets out the steps that Accedo Care 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. Accedo Care has a zero-tolerance approach to any form of modern slavery and human trafficking. 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.

Accedo Care is a limited company supporting adults with learning disability, Autism Spectrum Disorder, Mental Health and other needs. Currently, we support XXX people in Hertfordshire and London, employing XXX people. The organisation operates solely within the UK.

Our work comprises supported living services, registered with the Care Quality Commission, and commissioned by our local authority partners Hertfordshire County Council, the London Borough of Newham and London Borough of Barnet.

Accedo Care implements its business strategy in an ethically, socially and environmentally responsible manner. We fully acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights. The IBHR informs all of our policies related to the rights and freedoms of every individual who works for us, either as a direct employee, agency worker or indirectly through our supply chain. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our operations. Respect for the dignity of the individual – and the importance of each individual's human rights – form the basis of the behaviours we expect in every workplace nationally.

We will not accept any form of discrimination, harassment or bullying and we require all of our managers to implement policies designed to increase equality of opportunity and inclusion for all employees including agency workers. We have also developed and implemented policies and processes which are intended to extend these commitments through our supply chain.

Policies

We have several internal policies to ensure that we are conducting business ethically and transparently. These include:

- **Human Rights policy and our Ethics Policy** where we confirm that we will not tolerate or condone the abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected
- **Whistleblowing Policy**, aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated, and appropriate remedial actions are taken, and we will work closely withsocial care and health providers ensuring that our policies and procedures dovetail with local procedures and best practice
- **A robust recruitment policy**, including conducting eligibility to work in the UK checks for all employees to safeguard
- **Employee Code of Conduct** consistent with any professional codes of conduct

Direct Communication

The organisation encourages members of the public or people not employed by us to write, in confidence, to raise any concern, issue or suspicion of modern slavery in any part of our business.

Recognition, Risk Assessment and Due Diligence

As an organisation that supports people with care and support needs, we recognise that many can be vulnerable to exploitation. Through our person-centred approach and by following our safeguarding procedures, we carefully consider these specific risks and provide means by which we can prevent, support, and mitigate such risks.

With our ongoing suppliers and stakeholders, we continue to monitor compliance and will audit where we feel that further investigation is required. Via relationship management mechanisms we also maintain communication and personal contact with the stakeholders and key contacts in our supply chain to mitigate changes in their adherence to legislation and our shared values.

We expect our suppliers to have their own policies and procedures in relation to the Modern Slavery Act 2015, and any new suppliers must evidence this during the procurement and onboarding process. Contracts will not be signed until we are satisfied that these policies and procedures are in place.

We are committed to using neutral vendors when using suppliers. This provides us with a mechanism for ensuring those suppliers operate with fair, open, and transparent practices that provide full visibility of contractual and candidate information that can be verified and meets our legal and ethical requirements. In addition, we conduct our own

due diligence to undertake UK eligibility checks for all colleagues to safeguard against human trafficking or individuals being forced to work against their will.

Performance indicators

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

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

Safeguards

The organisation's whistleblowing and safeguarding policies and procedures provide guidance, linking in with local authority safeguarding procedures. These procedures will be followed if anyone identifies or receives any information pertaining to modern slavery involving any of the people we support, colleagues, contractors, volunteers, or partners. We provide regular formal and informal means by which issues can be reported and acted upon.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Modern slavery is one of the key components of the mandatory e-learning modules that colleagues are required to undertake, alongside other mandatory training such as safeguarding children and adults, data protection and reading and reviewing Code of Conduct.

Our training programmes provide an understanding of the risks and practices of modern slavery, human trafficking, and child labour that equip our colleagues to identify and report where they may experience or witness modern slavery taking place. Our training programmes are regularly reviewed to ensure suitability and relevance to the activities of the organisation and the regulatory framework within which we work.

Responsibility for this Statement

The ultimate responsibility for the prevention of modern slavery rests with the Accedo Board of Directors for ensuring that this policy and its implementation comply with our legal and ethical obligations. Managers at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

Assessment of effectiveness in preventing Modern Slavery

We understand that modern slavery risk is not static and will continue our approach to mitigating this risk. We will assess the risk via our internal auditing processes.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Accedo Care Ltd's modern slavery statement for the current financial year 2026/2027 (ending March 31st, 2027)

Ruth Georgiou – CEO

Richard McKenzie – Chair of the Board

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