

# Modern Slavery Statement

This statement comprises the modern slavery statement of the Four Seasons Health Care Group (the Group/we), in accordance with Section 54, Part 6 of the Modern Slavery Act 2015.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We have a zero tolerance approach to any form of modern slavery within our organisation and supply chain. 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. To date we have not found any indicators or instances of modern slavery in our organisation or supply chain.

## Organisational structure

The Group has a network of over 100 care homes across the UK and Jersey, employing approximately 9,000 team members and providing long-term and respite residential and nursing care, intermediate care, and palliative care to nearly 7,000 people.

## Protecting our team members

We are committed to treating all of our team members in a fair and consistent manner and in accordance with our principles. The measures we have in place to prevent modern slavery from occurring in our operations and supply chain are summarised below:

## Recruitment

We take a robust approach to recruiting both our permanent and flexible workforce (i.e. agency and bank workers). We communicate directly with people to discuss any work opportunities and to confirm details of any offer made. We have rigorous procedures in place for the vetting of new team members and flexible workers and ensure that we are able to confirm their identities and their right to work in the UK. We pay above the National Living Wage directly into a personal bank account.

All new permanent team members are required to complete an induction, which includes information and training on the Group's policies.

When using employment agencies, we only use specific reputable companies to source workers and always verify their practices before we engage them.

## Policies

The Group is committed to achieving and maintaining high standards of professional and ethical conduct amongst all team members. Our expectations are made clear through a number of policies including, but not limited to, the following:

- Recruitment Policy, to ensure that our recruitment practices are robust and that checks are undertaken prior to employment commencing;
- Anti-Bribery and Corruption Policy, to ensure that the Group and its workforce cannot be bribed or otherwise coerced into unfair and unethical practices;
- Safeguarding Adults Policy, to ensure that there are consistent mechanisms in place for people to report concerns about vulnerable adults;
- Safeguarding Children Policy, to ensure that there are consistent mechanisms in place for people to report concerns about children;
- Whistleblowing Policy, to provide a mechanism for team members to raise concerns about alleged wrongdoing without fear of reprisal;
- Grievance Policy, to give team members a mechanism for raising concerns about their treatment at work; and
- Employee Handbook, which provides information to all team members on their statutory rights, including, but not limited to, sick pay, holiday pay and any other benefits that they might be entitled to by virtue of their employment.

## The Group's supply chains

Our approach to procurement and our supply chain includes:

- ensuring that our suppliers are carefully selected through robust supplier selection criteria/processes;
- requiring that the main contractor provides details of its sub-contractor(s) to enable the Group to check their credentials;
- randomly requesting that the main contractor provide details of its supply chain;
- ensuring that our contract documents contain a clause on human rights issues;

- ensuring that our contract documents contain clauses permitting us to access a supplier's premises, personnel, systems, books and records as required to verify the supplier's compliance with modern slavery clauses;
- ensuring that our contract documents contain clauses giving the Group the right to terminate a contract for failure to comply with labour laws; and
- supplier adherence to our principles - we have a zero tolerance approach to modern slavery and expect all of our direct/indirect suppliers to have the same standpoint.

## Training

Advice and training about modern slavery is available to team members through our mandatory safeguarding children and adults training courses.

## Leadership approval

The Leadership Team has approved this statement and will review content annually.



Joe O'Connor  
Chief Executive Officer  
Four Seasons Health Care Group  
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