

## MODERN DAY SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 May 2024.

Kindbridge Health Care Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

### Organisational Structure

Kindbridge Health Care Ltd has business operations in the United Kingdom.

We operate in all business sectors. The nature of our supply chains is as follows: We work directly with NHS and Local Authorities who send us requests for job roles.

### Policies

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

Recruitment and selection policy - A Recruitment and Selection Policy aim at preventing modern slavery by including various measures that focus on transparency, due diligence, compliance, and support for victims. The policy should outline clear steps to ensure that all recruitment practices are ethical, legally compliant, and designed to avoid exploitation of workers. The policy starts with a strong commitment to preventing modern slavery in all forms, including forced labour, human trafficking, and exploitation. This sets the tone for the entire recruitment process and ensures that modern slavery is a priority for the organization. Zero tolerance clearly state that modern slavery is unacceptable, and the organisation is committed to ensuring that no workers are exploited through its recruitment process.

The policy must ensure compliance with national and international laws and standards designed to combat modern slavery, such as the UK Modern Slavery Act (2015). Include checks to ensure that workers have the legal right to work and that employers are compliant with the relevant labour laws. Verification of work permits and a worker's legal ability to work in the UK, ensuring no worker is being exploited through illegal or undocumented employment should be conducted.

**Supplier code of conduct** - A Supplier Code of Conduct is a set of ethical guidelines that companies require their suppliers to follow to ensure responsible business practices. One of the key areas that these codes address is the prevention of modern slavery, which includes forced labour, child labour, human trafficking, and other forms of exploitation. A well-crafted Supplier Code of Conduct typically seeks to prevent modern slavery through a combination of explicit policies, due diligence, monitoring mechanisms, and clear expectations for both suppliers and their subcontractors. The Supplier Code of Conduct usually includes a clear commitment to prohibiting modern slavery in all its forms.

This may be framed as a "zero-tolerance" policy for forced labour, human trafficking, and child labour. It will emphasize that suppliers must uphold the basic human rights of workers, including the right to freely choose employment, the right to be paid fairly, and the right to work in safe conditions. Suppliers must ensure that workers are employed voluntarily and not coerced into work through threats, violence, or manipulation. There should be no use of forced labour, bonded labour, or indentured labour. The code requires that workers have the freedom to leave their employment after a reasonable notice period and that they are not required to surrender personal identification documents or pay recruitment fees.

**Whistleblowing policy** - A well-designed whistleblowing policy is a crucial tool for organisations to prevent modern slavery by encouraging employees, contractors, suppliers, and other stakeholders to report any signs or suspicions of modern slavery activities within their operations or supply chains. The policy should start by providing a clear, concise definition of modern slavery. This includes identifying the various forms of modern slavery, such as forced labour, human trafficking, child labour, and involuntary servitude. Ensuring that everyone understands what constitutes modern slavery is key to recognizing potential violations. The policy should provide mechanisms for individuals to report concerns confidentially or anonymously, ensuring that whistleblowers feel safe from retaliation.

This includes clear instructions on how to make reports through hotlines, email addresses, or an online portal. Offering various reporting methods, such as phone lines, emails, online platforms, and in-person reporting, ensures that employees can report concerns in the manner they feel most comfortable. The policy must include a firm commitment that whistleblowers will not face retaliation for making reports in good faith. This reassurance is vital in fostering an environment where people feel empowered to speak out without fear of harm to their careers or safety.

A robust whistleblowing policy includes strong measures to protect the identities and personal information of whistleblowers to prevent discrimination, harassment, or retaliation. Providing support services, such as counselling or legal advice, for individuals who may fear personal repercussions for reporting.

**Staff code of conduct** - A staff code of conduct that seeks to prevent modern slavery is comprehensive and holistic, embedding anti-slavery practices into every aspect of the organisation's operations, from recruitment to supply chain management. It creates a framework that prioritises workers' rights, dignity, and freedom while also providing employees with the necessary tools and protections to identify, report, and prevent modern slavery. This approach not only ensures legal compliance but also helps create an ethical, transparent workplace where exploitation is actively sought out and eradicated.

**Procurement policy** - A procurement policy that aims to prevent modern slavery is designed to ensure that an organization's supply chains and operations are free from exploitation, forced labour, and human trafficking. The policy typically includes a set of standards, guidelines, and processes to reduce the risk of modern slavery, enforce ethical sourcing practices, and hold suppliers accountable. The policy will often include a Supplier Code of Conduct that requires all suppliers to adhere to strict ethical standards, particularly related to labour practices.

This code typically includes commitments such as, no forced or bonded labour, no child labour and freedom of association and collective bargaining. A procurement policy that prevents modern slavery will include a requirement for due diligence and risk assessments throughout the supply chain. Modern slavery prevention procurement policies frequently require suppliers to be transparent about their operations. This might include Supply chain mapping and annual reporting.

**Safeguarding policy** - A safeguarding policy designed to prevent modern slavery typically includes a range of preventative measures and commitments that align with legal requirements, ethical practices, and the organization's values. Modern slavery can encompass practices such as human trafficking, forced labour, child labour, and exploitation, and the policy must ensure robust measures are in place to protect individuals from these abuses. The policy should include a firm statement that the organisation has zero tolerance for any form of modern slavery and exploitation, emphasizing its commitment to human rights and ethical business practices. It should also detail adherence to national and international laws regarding modern slavery, including the Modern Slavery Act 2015 (UK) or similar legislation in other countries.

**We make sure our suppliers are aware of our policies and adhere to the same standards.**

## **Due Diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by:

Countries are strengthening laws that criminalize modern slavery, human trafficking, and forced labour. Examples include the UK's Modern Slavery Act (2015) which require businesses to report on measures to address slavery within their supply chains.

More efforts are being made to ensure that victims are identified and supported. This includes providing shelter, legal assistance, healthcare, psychological support, and skills training for survivors to reintegrate into society. It's crucial to train law enforcement, healthcare providers, and other frontline workers to identify victims of modern slavery more effectively.

Educating vulnerable populations, especially women and children, about their rights and providing them with alternatives to exploitative labour can significantly reduce the number of people falling into slavery.

More companies are being held accountable for labour practices in their supply chains. The push for supply chain transparency requires businesses to audit and report on how their goods are produced, and whether forced labour or human trafficking is involved.

Increased pressure on companies to adopt ethical sourcing practices, conduct due diligence, and actively work to eliminate modern slavery within their operations and supply chains is growing. Many large corporations have started to implement traceability measures and third-party audits to ensure ethical practices.

As consumers become more conscious of the conditions under which products are made, demand for ethically sourced goods rises, which can encourage businesses to adopt better practices. Consumers can also take steps to support companies with fair labour practices and avoid products linked to exploitation.

Public awareness campaigns are crucial to changing attitudes and behaviour around modern slavery. These campaigns can help educate people about the signs of trafficking and exploitation and how they can report suspected cases.

Migrants are particularly vulnerable to exploitation due to factors such as language barriers, lack of legal status, and unfamiliarity with local labour laws. Governments can put in place better protections for migrant workers to reduce the risks of trafficking and exploitation.

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