



Modern Slavery and Human Trafficking Policy



FS/IS 792392

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Our Values

Ethical Healthcare's sole purpose is to deliver positive and meaningful social impact on key societal challenges in the areas of health, wellbeing, and welfare.

Our values are at the core of everything we do, the behaviours we demonstrate and the improvement and changes we seek to deliver to our partners.



Equality and equity: we are never exploitative.



Integrity: we always act in line with our values and morals



Happiness: we strive to make our clients, our colleagues and ourselves happy in our work and lives.



Honesty and Transparency: we are always open and honest and are fully transparent in everything we do.



Compassion: we look for the best in all situations and people, we are generous in giving our support.

Document Administration

| Current Status | |
|-------------------|-------------------------------------|
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| Approvals: | Operations |
| Owner: | Operations Manager |
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Revision History

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| 0.1 | Initial draft | | Laura Blacker | 12 September 2023 | N/A |
| 0.2 | Draft | Review by HR | Dom Nally | 14 September 2023 | 12 September 2023 |
| 0.3 | Draft | Sign-off review | Lauren Bevan | 14 September 2023 | 17 September 2024 |

Approval History

| Version Number | Approved by | Approval Date |
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| 1.0 | Director of Consulting | 15 September 2023 |

1 Introduction

This policy sets out the steps that Ethical Healthcare Consulting (EHC) has taken to combat modern slavery in our supply chains, or in any part of our business. We recognise the importance of addressing modern slavery and human trafficking in all its forms, and we are committed to preventing these abuses within our operations and supply chains. We will not tolerate any form of modern slavery, including forced labour arising from physical or mental threats, child labour, debt bondage, or human trafficking, and we expect the same commitment from our employees, associates, and business partners.

This policy outlines our approach to identifying and tackling modern slavery and sets out the steps we take to ensure compliance with relevant laws and regulations.

2 Our workforce

EHC mitigates the risk of modern slavery occurring in its workforce by ensuring that directly employed staff are recruited by following robust HR recruitment processes. These include requesting employment references, proof of eligibility to work in the United Kingdom and completing identification checks. There is a whistleblowing policy in place for members of staff to raise any concerns about potential wrongdoing within EHC.

Similarly, associates are engaged following a robust HR process. We expect our associates and suppliers to adhere to the same principles and standards outlined in this policy. We will work collaboratively with our business partners to ensure compliance with anti-slavery measures.

We have a zero tolerance to slavery and human trafficking. Any associate, supplier or potential supplier who does not adhere to our values or is found not to be compliant with this policy will result in the termination of their contract with us and will not be considered for future engagements unless they are able to demonstrate full adherence with the requirements of the Modern Slavery Act and our own policies and procedures. This includes failing to report suspicions or evidence of human trafficking or forced labour.

3 Risk Assessment

EHC will regularly assess the risk of modern slavery in our operations. This assessment will consider factors such as geographic location, industry sector, and the nature of work. Based on this assessment, we will develop and implement appropriate mitigation measures.

As part of our initiative to identify and mitigate risk we will:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Not enter into business with any sole trader or organisation, in the UK or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour
- Monitor potential risk areas in our supply chains
- Ensure no one employed or working with EHC is paid less than the minimum wage that applies in their host country, or works more hours than is legally allowed
- Protect whistle-blowers.

These measures are embedded into our policies and procedures.

4 Training and Awareness

EHC will provide training and awareness programs for employees, associates, and business partners to ensure they understand what modern slavery is, how to recognise potential signs, what the risks are and your responsibilities in preventing it. Training will be regularly updated to reflect changes in legislation and best practices.

5 Reporting Mechanisms

EHC encourages the reporting of any concerns related to modern slavery. You can report suspicions or incidents in confidence to your line manager, SRO, members of the board, HR, or in line with the whistleblowing policy.

5.1 Investigations

Upon receiving reports of potential modern slavery, EHC will conduct thorough investigations to determine the validity of the concerns. Appropriate actions will be taken based on the findings, which may include disciplinary action, termination of contracts, reporting criminal activity to the relevant authorities and, where necessary, taking legal action.

6 Review and Continuous Improvement

This Modern Slavery Policy will be reviewed annually to ensure its effectiveness and compliance with relevant laws and regulations. We are committed to continuously improving our approach to combating modern slavery and human trafficking in all its forms. We will work tirelessly to protect the rights and dignity of all individuals, and to contribute to the eradication of modern slavery in our society.