



Modern Slavery Act Statement

Introduction

This statement includes all legal entities within and associated to Wellgate and relates to actions and activities during the financial year ending 30th November 2024 and is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act').

Wellgate is committed to improving its practices to combat modern slavery and human trafficking. This statement sets out Wellgate's actions to understand all potential modern slavery risks related to its business and to ensure that there is no slavery or human trafficking in the company or its supply chains.

Wellgate recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking.

Governance

Wellgate is committed to conducting business ethically and responsibly. The company fully supports the aims of the Act and is committed to combatting modern slavery and human trafficking wherever possible.

The Board will review and oversee implementation of the modern slavery statement. It sets out Wellgate's approach towards modern slavery compliance by our staff across the business functions. The Senior Management Team manages the composition and publication of our annual statement and provides updates to staff as well as the Board.

Our commitment

- Wellgate is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We acknowledge the role that we can play to support this.
- We are an equal opportunities employer, fully committed to creating and ensuring an inclusive and respectful working environment for all employees. We want our staff to feel confident that they can report concerns without any risk to themselves.
- Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard staff from any abuse or coercion.
- We recognise that, as a purchaser of goods and services, we have the opportunity to promote good practice in the employment and management of people by our suppliers.



- We do not enter into business with any organisation which knowingly supports or is found to be involved in modern slavery, servitude and forced or compulsory labour.

The following outlines the steps Wellgate has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

Organisational Structure

The Group provides person centred supported living and residential services for people with learning disabilities, autism, and physical disabilities.

The Group consists of the following services:

- **Supported Living** (including Wellgate Support and WG Homecare)
- **Residential Care** (including MNP Complete Care and Lime Lodge)

The Board of Directors of Wellgate are responsible for ensuring the services meet good corporate governance standards in all areas of the business including, Person Centred Support, Finance, HR, Environmental and Social governance.

Wellgate operates services at multiple sites across the UK and has contracts with non-profit and private sector organisations.

Supply chains

Wellgate purchases goods and services from the UK. Where possible we make use of approved purchasing frameworks.

We build relationships with our suppliers to ensure they understand our values and comply with our expectations and commitment to protect human rights and the environment. As part of our purchasing processes, we conduct a risk assessment to ensure all of our suppliers are reputable and comply with the requirements of the Modern Slavery Act.

Relevant Policies and Procedures

We are committed to ensuring there is no modern slavery or trafficking in our business or supply chains. We require all our suppliers to comply with relevant policies; including our Equal Opportunities Policies and specifically to comply with our policies relating to the health, safety, welfare, and dignity of those with whom they come into contact. This is supported by our purchasing policy and procedure.

Our policies which relate to the Modern Slavery Act 2015

The following policies are available to all staff from the QCS or Access Systems:

- Modern Slavery and Human Trafficking
- Purchasing
- Safeguarding
- Dignity
- Equality and Human Rights
- Whistleblowing

These policies detail the standards required from our staff and include details of the processes in place to report issues or concerns about Modern Slavery.

Due Diligence and risk assessment

The above checklist of policies enables the Group to identify risks of modern slavery and trafficking in the business and its supply chain.

We carry out a risk assessment for all new suppliers wishing to provide goods or services to the business. The level of due diligence undertaken is based on what products they are supplying and how we are using it.

How we manage suppliers moving forwards will depend on the assessed risk.

Wellgate will not conduct business with any organisation which knowingly supports or is found to be involved in modern slavery, servitude and/or forced or compulsory labour.

Monitoring Performance

Wellgate has set the following key performance indicators to measure effectiveness to ensure modern slavery is not taking place within the company or its supply chains.

Wellgate will:

- Monitor the number of staff who receive training in relation to the requirements of the Act through our internal training and induction programmes.
- Monitor the instances of current suppliers found to be in breach of the requirements relating to the Act.
- Be responsible for compliance and ensure these measures have been successfully implemented and are reviewed on an annual basis.

Training

It is essential that all our employees have an awareness of modern slavery issues. We provide information and training to staff on an ongoing basis, and will also deliver one to one support and guidance:

- How to identify the signs of modern slavery and human trafficking.
- What steps Wellgate should take if suppliers or contractors do not have anti-slavery policies, including their removal from the company's supply chain.
- What initial steps will be taken if slavery or human trafficking is suspected.
- How to report potential modern slavery or human trafficking issues to the relevant people within the company.
- What external help is available, (e.g. on the Modern Slavery and exploitation website helpline at Modern Slavery Helpline).

Approval

This statement has been approved by the Wellgate Board on 30 November 2024. The Board will review and update the statement annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Signed by: Helen Dyball

Name: Helen Dyball

Designation: Head of HR

Next review date: November 2025