



Modern Slavery Statement

This statement is made in relation to the Modern Slavery Act 2015 and sets out the steps that HC-One, has taken and is continuing to take to ensure that modern slavery and/or human trafficking is not taking place within our business or wider supply chain.

Modern slavery encompasses slavery, servitude, human trafficking, and forced or compulsory labour, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. HC-One has a zero-tolerance approach to any form of modern slavery.

We are committed to acting ethically, 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 from taking place within the organisation or our wider supply chain.

Our Business

HC-One specialises in Dementia, Nursing, Residential and Specialist Care with homes throughout the UK. Each of our Residents and their relatives can trust that the care they will receive will be delivered with kindness, thoughtfulness, and respect in a safe, warm, comfortable and welcoming environment.

HC-One stands for Health and Care – which is what we do – and the One which symbolises how we do it. At HC-One we focus on the individual, striving to provide the best and kindest possible care to the one who matters, the Resident, by the one who makes the difference, the individual colleague.

We are an integrity-driven company founded on the principles of accountability, involvement and partnership, with a leadership team of highly experienced senior health and social care professionals. We want relatives, residents, colleagues, suppliers, purchasers, and regulators to know that we will listen with the goal of learning and improving. We are on a journey to provide the kindest possible care and experience for residents, simply, easily, effectively, and efficiently while employing some of the kindest and most professional care practitioners from across the globe.

Our Policies

We have a number of internal policies, procedures and partnership services, to ensure that we are conducting business in an ethical and transparent manner. Our policies and procedures are regularly monitored and reviewed. The key policies, procedures and partnership services that contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chains

are:

Ethical Procurement Procedure - this procedure sets out the organisation's expectations that both colleagues and suppliers respect our ethical standards. The procedure confirms HC-One's commitment to seek out suppliers that share the organisation's commitment to sound ethical practices, and the principles of fair and honest dealings at all times.

Recruitment Procedures - we continue to operate robust safe recruitment procedures, including conducting Right to work in the UK checks for all employees to safeguard against human trafficking and/or individuals being forced to work against their will. Additionally, we ensure that all colleague wages will be at least national minimum wage, if not the living wage, and that working hours comply with national requirements with particular consideration to working time regulations, and health and safety regulations.

Anti-Harassment and Bullying Policy – the Anti-Harassment and Bullying Policy sets out the organisation's commitment to providing a working environment free from harassment and bullying. It also seeks to ensure all colleagues and business partners are treated and treat others with dignity and respect. We investigate, record, and manage any reported cases where things have gone wrong, when an undesirable experience is raised or observed and/or where malpractice is reported.

Employee Assistance Programme - Life Management – the organisation works in partnership with AXA PPP Healthcare to provide an Employee Assistance Programme (EAP). This is a confidential service that all HC-One employees can access for independent and confidential guidance and support on issues ranging from domestic matters to housing and financial matters. The Employee Assistance Programme ensures that employees receive the emotional as well as practical support they need and points them in the direction of any further help relevant to their enquiry.

Whistleblowing Procedure – the procedure sets out how colleagues can report any issues of concern or wrongdoing. It seeks to inform and re-assure all colleagues that they can raise concerns confidentially either with their manager, their superior, or, a member of the operational team, about how other colleagues are being treated or practices within our business or supply chain, without fear of reprisals. It sets out and establishes that the colleague should not suffer any detriment such as bullying and/or harassment as a result of having made the report.

SeeHearSpeakUp – the organisation also works in partnership with the SeeHearSpeakUp Service which is an external and independent global whistleblowing service. The service allows colleagues who may not feel comfortable reporting concerns internally within the organisation to report matters externally in a secure and confidential manner without fear of reprisal. The service operates 24 hours a day, 365 days a year and can offer translation services for over 200 languages.

Our Suppliers

HC-One operates a supplier process which ensures that all suppliers perform in line with HC-One terms and conditions, along with maintaining a preferred supplier list through a "closed" eProcurement system which has been in operation since May 2018. We conduct due diligence on all suppliers before placing them on our preferred supplier list. Our ethical procurement procedure forms part of our contract with all suppliers and they are required

to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- No child or forced labour will be utilised.
- They abide by local legislation including national minimum wage and working time regulations.

HC-One continues to operate by the principles of this statement and maintains its zero-tolerance approach towards modern slavery. All suppliers and contractors continue to be bound by HC-One policies and procedures which support our commitment to ethical and transparent operations.

Our Performance Indicators

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

- No reports have been received from colleagues, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Where cases, or allegations, of slavery or forced labour are identified within our supply chain, we will investigate any concerns thoroughly. There have been no such cases or allegations in our Financial Year 2024/25.

Responding to Updated Statutory Guidance on Victim Support

Following the August 2025 updates to the *Modern Slavery Statutory Guidance* under section 49 of the Modern Slavery Act, we have reviewed and strengthened our internal processes to ensure compliance and victim-centred support:

- Updated internal training materials to reflect revised definitions of exploitation and clarified procedures relating to public order disqualification.
- Enhanced escalation pathways so employees, contractors and suppliers know how to report suspected cases, in line with the Duty to Notify.

Will consider collaborating with external partners to support individuals identified as potential victims of exploitation within our operations or supply chain.

Our Focus for continuous improvement

- Set up a Modern Slavery Working Group to assess, monitor and mitigate risks relating to slavery and human trafficking within the organisation, with individual departments taking specific actions where appropriate to the level of risk.
- Employee training & policy awareness to raise colleagues' awareness of trafficking

and modern slavery, and ensure colleagues involved in procurement activity are aware of and follow the modern slavery procurement guidance.

- To ensure that colleagues involved in the recruitment and deployment of workers receive comprehensive training on modern slavery and ethical employment practices.
- Implement a new Human Rights Policy and undertake the communications strategy for updating the business.
- To work closely with international recruitment agencies to ensure that they are aware of the organisation's modern slavery and human trafficking statement and ethos.
- Continue to undertake due diligence on our key suppliers to enable us to make better judgements on transactions and the integrity of our supply chain.
- To maintain our close partnership with the SeeHearSpeakUp service. We will continue to listen, learn and improve by thoroughly investigating all whistleblowing cases reported by colleagues directly to the organisation or via SeeHearSpeakUp. Particular emphasis will be placed on finding out what the information gleaned through these mechanisms tells us with regards to our objective and drive for transparency and ethical behaviors throughout the organisation.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes HC-One Slavery and Human Trafficking statement for the financial year ending 2024 – 2025.

Approval for this statement:

This statement was approved by the CEO on 20th April 2026

Name: David Smith, Chief Executive Officer

Signature: 

Date: 20th April 2026