



Our family, caring for yours

Modern Slavery Act Statement

1. Structure

Country Court Care Group is headquartered in Peterborough, England, and provides residential care services for older people who require additional support to maintain an independent lifestyle.

We are serious about our brand because it's part of our identity and so is our commitment to corporate social responsibility. We believe transparency is the best way we can ensure the public that we are doing our best as an ethical corporate citizen. In that spirit, we have published this inaugural statement, addressing the issue of slavery and human trafficking, in compliance with section 54 of the Modern Slavery Act 2015.

We are fully convinced of and are committed to the ideals set out in the Modern Slavery Act and have taken initial steps to author a robust Modern Slavery Act Statement that will live out these ideals within our organisation. We will thoroughly examine how slavery and human trafficking can affect our business and explain the steps we will be taking in the fight against it. This statement is intended to fulfil the legal requirement for a slavery and human trafficking statement on behalf of all companies within the Country Court Care Group as relevant. Our efforts against slavery and human trafficking will complement our broader CSR Policy and our adoption of the Ethical Trading Initiative.

Building on our existing CSR Policy and our commitment to the Ethical Trading Initiative, we will embrace the requirement to publish an annual slavery and human trafficking statement. This will allow us to share our efforts against slavery and human trafficking and improve and measure our success each financial year.

2. Slavery and human trafficking policies

We are currently developing our Slavery and Human Trafficking Policy, which will be an integral part of our CSR Policy. We will also update our Supplier Code of Conduct. The policy will set out clear objectives for 1, 3 and 5 year slavery and human trafficking plans around the following themes:

- Relationships: Strengthening our supplier engagement process
- Feedback: Establishing grievance mechanisms and channels for individual worker feedback
- Knowledge: Improving our knowledge base by collecting relevant data and improving product traceability

- Third party engagement: Building strategic alliances with local authorities, CCGs and other health and social care professionals who impact the lives of the people we support.
- Measurable change: Developing verifiable KPIs to measure progress
- Supplier collaboration: Encouraging suppliers to collaborate to address slavery and human trafficking issues
- Incentivisation: Developing mechanisms to incentivise employees and suppliers to address slavery and human trafficking and improve labour standards
- Accountability: Establishing a framework for organisation accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery and human trafficking

3. Due diligence procedures

We understand that our biggest exposure to Modern Slavery is in our recruitment of staff from outside the United Kingdom and Ireland. supply chains, where we have undertaken activity over the last decade to minimise the risk of Modern Slavery. Within these areas, new suppliers and factories/sites are subject to due diligence checks in the form of ethical/compliance audits. Such audits are also regularly conducted for existing suppliers and factories/sites. These audits assess compliance with the Global Sourcing Principles and are, amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

4. Identifying, assessing and managing risk

In the financial year ending in March 2018 we had not yet introduced measures to address the risk of modern slavery in our supply chains. Moving forward, we will set out to identify the extent of any slavery and human trafficking in our supply chains by:

- Conducting spontaneous spot-checks of the agencies we rely on to recruit staff from outside the United Kingdom and Ireland.
- Engaging third party auditors to conduct spontaneous social audits.
- Interviewing workers recruited from outside the United Kingdom and Ireland, to discuss their conditions and their rights
- Instituting an annual review questionnaire for existing suppliers to understand suppliers' self-assessment of slavery and human trafficking

issues, allowing us to better identify slavery and human trafficking issues as they develop over time and to collect supplier-provided data to track improvement in suppliers' attitudes.

5. Key performance indicators

In order to assess the effectiveness of our modern slavery measures we will be reviewing the following key performance indicators:

- Staff training levels
- Number of slavery incidents reported in the supply chain

6. Training available to staff

A key part of our slavery and human trafficking strategy is to promote cultural change through training. To this end, we have started development of a dedicated training and resources page within our company employees' hub, which individual workers in the supply chain will be able to access to learn about modern slavery and human trafficking, understand their rights and anonymously report any slavery and human trafficking issues in their workplace.

7. Approval of this statement

This Modern Slavery Act statement was approved by the directors on 4 January 2019.

Signed by:



Al-Karim Kachra

Director, Country Court Care Group Limited