



**Ashberry Healthcare Ltd**  
**Modern Slavery and Human Trafficking Policy**



## Policy Statement

Ashberry Healthcare Ltd is committed to preventing modern slavery and human trafficking in all its business activities and supply chains. We take our responsibilities under the UK Modern Slavery Act 2015 seriously and are committed to acting ethically, with integrity and transparency in all our business relationships.

As a UK-based organisation employing approximately 500 employees, we recognise that we have a responsibility to assess and address the risk of modern slavery within our operations and supply chains and to take appropriate steps to mitigate those risks.

We have a zero-tolerance approach to modern slavery and human trafficking.

## Scope

This policy applies to all individuals working for or on behalf of Ashberry Healthcare Ltd, including employees, directors, agency workers, contractors, consultants, temporary workers, apprentices, volunteers, suppliers, contractors, and other business partners.

This policy applies to all business operations carried out in the United Kingdom.

## Definitions

**Modern Slavery** is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced or compulsory labour, and human trafficking, all of which involve the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

## Legal Framework

This policy is aligned with the UK Modern Slavery Act 2015, which requires certain businesses to publish an annual slavery and human trafficking statement setting out the steps taken to ensure that modern slavery is not taking place in their business or supply chains.

## Roles and Responsibilities

### Board of Directors

The Board has overall responsibility for ensuring that Ashberry Healthcare Ltd complies with its legal and ethical obligations relating to modern slavery and for approving this policy and the annual Modern Slavery Statement.

### Management

Management is responsible for implementing this policy, overseeing risk assessments and due diligence, and ensuring appropriate training is provided.

### Employees

All employees are responsible for:

- Complying with this policy
- Remaining alert to the risks of modern slavery and human trafficking
- Reporting concerns promptly

## Risk Assessment and Due Diligence

Ashberry Healthcare Ltd will:

- Identify and assess areas of potential modern slavery risk within its business and supply chains
- Conduct proportionate due diligence on suppliers, contractors, and business partners
- Include anti-slavery and human trafficking provisions in supplier contracts where appropriate
- Review supplier compliance on a risk-based approach

## Supply Chain Expectations

We expect all suppliers and business partners to:

- Comply with the UK Modern Slavery Act 2015 and all applicable employment laws
- Ensure that workers are not subject to forced, bonded, or involuntary labour
- Maintain fair recruitment practices, including the prohibition of worker-paid recruitment fees
- Permit audits or assessments where reasonably required



Failure to meet these expectations may result in corrective action or termination of the business relationship.

## Training and Awareness

Appropriate training will be provided to employees, particularly those involved in procurement, recruitment, and supply chain management, to help them identify and respond to modern slavery risks.

## Reporting Concerns

Employees and other stakeholders are encouraged to report any concerns relating to modern slavery or human trafficking. Reports can be made through:

- A line manager
- Human Resources
- The Compliance or Legal function
- The Whistleblowing procedure

All reports will be treated confidentially and investigated appropriately.

## Whistleblowing and Protection

Ashberry Healthcare Ltd is committed to ensuring that no individual suffers any detrimental treatment because of reporting a concern in good faith. Retaliation against whistleblowers will not be tolerated.

## Breaches of the Policy

Any breach of this policy by employees may result in disciplinary action, up to and including dismissal. Breaches by suppliers or business partners may result in contract termination.

## Review and Monitoring

This policy will be reviewed annually and updated as necessary to reflect changes in legislation, business activities, or risk profile.



## Modern Slavery Act 2015 – Slavery and Human Tracking Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Ashberry Healthcare Ltd has taken during the financial year ending 2026 to ensure that slavery and human trafficking are not taking place in our business or supply chains.

### Our Business

Ashberry Healthcare Ltd is a UK-based organisation employing approximately 500 employees. Our principal activities include providing day-to-day specialist nursing and residential care in England and Wales. We operate primarily in the United Kingdom, with supply chains that may extend internationally.

### Our Policies

We have implemented a Modern Slavery and Human Trafficking Policy which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to mitigate the risk of modern slavery.

### Due Diligence and Risk Management

We operate a risk-based approach to due diligence in our supply chains. This includes:

- Assessing modern slavery risks when onboarding new suppliers
- Incorporating anti-slavery provisions into supplier contracts where appropriate
- Taking action where risks are identified

### Training

Relevant employees receive training to help them understand modern slavery risks and how to identify and report concerns.



## Effectiveness

We monitor the effectiveness of our approach through periodic reviews of supplier compliance, internal reporting mechanisms, and policy reviews.

## Approval

This statement has been approved by the Board of Directors of Ashberry Healthcare Ltd.

**Signed:**

**For and on behalf of the Board of Directors of Ashberry Healthcare Ltd**

**Name: Claire Fry**

**Title: Operations Director**

**Date: 4th March 2026**



## Supplier Code of Conduct

### **Purpose**

This Supplier Code of Conduct sets out the minimum standards that Ashberry Healthcare Ltd expects from all suppliers, contractors, and business partners. It supports our commitment to ethical business practices and compliance with the UK Modern Slavery Act 2015.

### **Compliance with Laws**

Suppliers must comply with all applicable laws and regulations, including but not limited to employment, health and safety, and modern slavery legislation.

## Prohibition of Modern Slavery

Suppliers must not engage in, support, or tolerate any form of modern slavery, including:

- Forced, bonded, or involuntary labour
- Human trafficking
- Slavery or servitude

Workers must be free to leave employment after reasonable notice and must not be required to lodge deposits, identity documents, or pay recruitment fees.

## Fair Employment Practices

Suppliers must:

- Provide wages and benefits that meet or exceed applicable legal minimums
- Ensure working hours comply with applicable laws
- Treat workers with dignity and respect, free from harassment, abuse, or discrimination

## Health and Safety

Suppliers must provide a safe and healthy working environment and take appropriate steps to prevent accidents, injuries, and occupational health risks.



## **Right to Audit and Information**

Ashberry Healthcare Ltd reserves the right to request information or conduct reasonable audits to assess compliance with this Code of Conduct.

## **Reporting Concerns**

Suppliers must promptly report any actual or suspected breaches of this Code, including any concerns related to modern slavery or human trafficking.

## **Breach and Termination**

Failure to comply with this Code of Conduct may result in corrective action, suspension, or termination of the business relationship.

## **Acknowledgment**

Suppliers are expected to acknowledge and adhere to this Supplier Code of Conduct as a condition of doing business with Ashberry Healthcare Ltd.