

Anti-Slavery and Trafficking Statement 2024

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

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to ensuring as far as possible, that all of our suppliers hold a similar ethos. We do not believe there to be any high risk operations within the work of Cottongrass Homes Limited and its supply chains with regards to modern slavery and human trafficking.

Our Anti-slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Through our commitment, we will:

- Through our procurement, aim to check and draft specifications to include a commitment to support the requirements of the Act. If suppliers do not have their own Modern Slavery statement/policy, we will make our statement available and obtain assurances of the supplier's commitment to follow prior to supply commencing. This is a service level agreement expected of all suppliers.

If, after supply commences, we believe there is an actual breach or risk of breach, we will investigate this following our Complaints Policy.

- Operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. To include:
- Whistleblowing Policy, aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery.
- Complaints Policy. Whilst aimed at receiving complaints or concerns about our care provision or conduct, all complaints received will be fully investigated and appropriate remedial actions taken and we will work closely with our social care and health partners ensuring our safeguarding policies and procedures dovetail with local procedures and best practice.
- A robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard.
- Agency employment policies and procedures. We expect that all agencies that supply Cottongrass Homes Limited ensure that staff are screened and vetted in line with best practice and relevant legislation to ensure: Authentic and legal documentation, right to work in the UK and identity, as well as assessing for any concerning behaviours/fears/pay or banking irregularities or health issues that may require further review in line with combating Modern Slavery.
- Anti-Fraud, Bribery and Corruption Policy. It is our policy to conduct all of our business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, our employees are encouraged to identify and report any potential breaches of our anti-slavery policy and we have in place protection for whistle blowers.

Direct Communication

The Company encourages members of the public or people not employed by us to write, in confidence, to raise any concern, issue or suspicion of modern slavery in any part of our business.

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

- No reports are received from employees, the public, or law enforcement agencies or local safeguarding teams to indicate that modern slavery practices have been identified.

Safeguards

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

The Company will accept and take seriously concerns communicated anonymously.

Staff are hereby informed of the Modern Slavery Helpline on [0800 0121 700](tel:0800 0121 700) in accordance with the training recommendations of "Transparency in Supply Chains etc. A practical guide" (Guidance issued under section 54(9) of the Modern Slavery Act 2015).

Whistleblowing, Safeguarding and Child protection form part of mandated training for our staff.

Through this statement and company policies, Cottongrass Homes Limited is proud and committed to support the following statements:

- We adhere to local and national laws
- We support the Freedom of workers to terminate employment
- We support the Freedom of movement
- We support the Freedom of association
- We prohibit any threat of violence, harassment and intimidation

- We prohibit the use of worker-paid recruitment fees
- We prohibit compulsory overtime
- We prohibit child labour
- We prohibit discrimination
- We prohibit confiscation of workers original identification documents
- We provide access to remedy, compensation and justice for victims of modern slavery