

## Modern Slavery Statement 2021

This statement is made in relation to the Modern Slavery Act 2015 and sets out the steps that Opal Limited has taken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business.

### Our Business

We are providers of social care for adults in the UK. We strive to deliver the best care possible and ensure our residents lead an independent life as much as possible. We are committed to the delivery of individualised care for all our residents whilst treating each resident and their families with dignity and respect.

Opal Limited strictly prohibits the use of modern slavery and human trafficking in our organisation or the supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

### Our Commitment

We are committed to identifying, preventing and monitoring risks of slavery, human trafficking and forced labour in our business and supply chains. We have a zero tolerance to such practises. We are and shall continue to be a company that expects everyone working with us, or on our behalf, to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf.
- We do not expect any employee or contractor to engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in all parts of our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review.
- When approving contractors, suppliers, employment and recruitment agencies to declare they are compliant with the minimum standards required to combat modern slavery and trafficking.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with modern slavery requirements.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

## Our Policies

We have put in place a number of significant actions to ensure that we are able to meet and surpass our commitment. These are:

- Modern slavery policy statement now forms part of our main employee handbook. We give a commitment to circulating this to all employees on an annual basis to remind them of the importance of being vigilant to the risk of modern slavery, and the need to report any indications that it may be taking place without delay.
- We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- We operate robust remuneration processes for employees to ensure they are paid directly and not less than the minimum wage.
- We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Our policies for the protection of vulnerable adults describe our duties to protect those who are vulnerable. The emphasis is on those for whom we are providing care, but also recognises there may be times when these are our work colleagues.
- Our training is being reviewed and updated to ensure it provides our employees with information to recognise the situations where modern slavery and human trafficking may occur and reinforce their duty to report any concerns.

## Our Suppliers

Opal Limited operates services providing residential care to adults in the UK. Customers are either individuals or their relatives who wish to purchase their own care or statutory bodies purchasing care on their behalf.

The supply chains include the provision of staff through employment and recruitment agencies, goods and services for the maintenance of residential care buildings, and goods and services associated with the provision of care to older adults.

There is a consistent, rather than seasonal, need for suppliers which provides a stability in the supply chain and procurement processes. We are working with a procurement supplier and have made them aware of the requirements under the Modern Slavery Act 2015 and our expectation that all our suppliers comply with this legislation in all aspects of their business.

Our approved supplier and contractor process ensure that all suppliers and contractors perform in line with our agreed terms and conditions. We conduct due diligence on all suppliers and contractors before allowing them to become a preferred supplier which includes seeking confirmation that no part of their business operations contradicts this policy. This includes seeking confirmation that:

- They have taken steps to eradicate modern slavery within their business,
- They hold their own suppliers to account over modern slavery,



- They pay their employees at least the national minimum wage/national living wage as appropriate,
- We may terminate the contract at any time should any instances of modern slavery come to light.

### **Our Performance Indicators**

We will evaluate the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain by monitoring processes to identify any concerns or reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes Opal Limited Slavery and Human Trafficking statement for the financial year ending 2020/2021.

This statement was approved by the Board of Directors on 24<sup>th</sup> March 2021