

Modern Slavery Act

Slavery & Human Trafficking Statement

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Elysium Healthcare Group's slavery and human trafficking statement for the financial year ending 31 December 2021.

A list of the Group's companies covered by this Statement are listed below.

Our Business

Elysium Healthcare was formed in December 2016 and, following a number of acquisitions, we operate over 70 hospitals and other facilities across England & Wales, giving a portfolio across mental health care, neurological care, education, children's services and private patient services.

Our aim is to set new standards in the delivery of specialist care through our strategic network of sites, providing a complete pathway of care.

Policies on modern slavery and human trafficking

We are committed to acting ethically in all our business dealings and to improve our processes and controls to ensure modern slavery is not taking place anywhere in our business and our supply chains.

Our policies and codes of conduct sets out how we expect our employees to behave. This includes the requirement that all of our business is conducted in an honest and ethical manner.

We have a safeguarding policy to help our staff recognise and report abuse and neglect, including within the context of modern slavery, and a whistleblowing policy which sets out a process for staff to raise concerns.

We also have a right to work policy to make sure that we meet our legal obligations under the Immigration, Asylum and Nationality Act 2006, by making sure that anyone who works for us has the right to work in the UK to help ensure human trafficking is not occurring within our workforce.

In 2021 we also introduced an Environmental, Social and Governance Policy which includes our expectations in relation to staffing and human rights practices.

We expect our suppliers and business partners to share our intolerance to modern slavery. For example, each of our suppliers is obliged to provide us with its modern slavery policy, including the date the policy is due for review. The supplier is then automatically prompted to update the policy in advance of its expiry. The policy is then reviewed by our procurement team before the supplier can be approved for continued and future use.

Training for staff

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

We carry out safeguarding training within the business, helping staff to identify individuals who may be at risk and how to escalate concerns.

Modern slavery is recognised as a category of abuse in both our safeguarding policy and our training. We ensure our safeguarding training is in line with published guidance and delivered at the appropriate level for all our staff.

Due diligence processes

We have implemented checks within our procurement processes to identify, assess and mitigate the risk of slavery and human trafficking occurring within our business and in our supply chains and to protect whistle blowers. This includes through our eProcurement due diligence platform where suppliers must respond to questions on equal opportunities and human rights; modern slavery; and ethics and ethical trading. A decision is made to keep or remove them from our supply chain based on their response

As part of our temporary staffing procurement, we have the means to identify, assess and mitigate the risk of slavery and human trafficking occurring. This is in part due to our agency audit framework which has been created to adapt and be responsive to maintain the ability to identify any issues. Some ways in which this is done is through audits looking at high risk compliance areas such as Right to Work checks.

Structure and supply chains

Our supply chains include hospital equipment, medical supplies, construction, catering, agency staffing, office supplies, and waste and recycling services.

Our supply contracts require those in our supply chain and contractors to comply with the law as well as our policies and codes to combat modern slavery. We require our suppliers to hold their own subcontractors and suppliers to the same standards, and to implement procedures to ensure that there is no slavery or human trafficking in their supply chains.

To date we have not had an issue with a supplier's compliance with anti-slavery and human trafficking.

Risk assessment

As part of our efforts to monitor and reduce the risk of modern slavery occurring within our supply chains we evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain. We have the assurance from suppliers in our supply chain that they have taken appropriate measures to manage modern slavery in their business, and we do not believe that any activity within our Group is a high risk of slavery and human trafficking.

Measuring effectiveness

We measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains: These measurements include:

- number of known incidents of slavery and human trafficking,
- number of suppliers investigated on suspicion of slavery and human trafficking,
- level of staff compliance with training.

We are not aware of any incidents relating to slavery and human trafficking within our organisation.

Further steps

Following a review of our actions to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to continue reviewing the measures we have undertaken and monitoring the robustness of the systems and controls we have in place.

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Approved by the Board of Directors of Elysium Healthcare Holdings 3 Limited on 30 September 2022.

Signed

A handwritten signature in blue ink that reads "Joy Chamberlain". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Joy Chamberlain
CEO, Elysium Healthcare

Subsidiary companies covered by this Statement

Elysium Healthcare Limited
Elysium Healthcare No.2 Limited
Elysium Healthcare No.3 Limited
Elysium Healthcare No.4 Limited
Elysium Neurological Services Limited
Elysium Neurological Services (Badby) Limited
Elysium Neurological Services (Adderley) Limited
Darlington Neurological Care Centre Limited
The Bridge Care Centre Limited
Elysium Healthcare (Farndon) Limited
Stanley House Limited
Lighthouse Healthcare Group Limited
Elysium Healthcare (Lighthouse) Limited
Elysium Healthcare (Acorn Care) Limited
Elysium Healthcare (Phoenix) Limited
Elysium Healthcare (Field House) Limited
Elysium Healthcare (Healthlinc) Limited
Elysium Care Partnerships No.2 Limited
Elysium Healthcare No. 5 Limited
Elysium Healthcare (Ann House) Limited
Elysium Healthcare No. 6 Limited
Elysium Healthcare (Gregory House) Limited
CareProgress Limited
Elysium Care Partnerships Limited
London Care Partnership Community Care Services Limited
London Care Partnership (Supported Living) Limited
Celtic Resource Management Limited
Pendaren Court Limited
iMeUs Limited
Elysium Healthcare (Ultimate Care) Limited
Focus on Care Recruitment Limited
St George Healthcare Limited
Elysium Healthcare (St Mary's) Limited
Elysium Healthcare (All Saints) Limited
The Chimneys Healthcare Partnership Limited
The Chimneys Limited
Elysium Healthcare Property 1 Limited
Elysium Healthcare Property 2 Limited
Elysium Healthcare Property 3 Limited
Elysium Healthcare Property 4 Limited
Elysium Healthcare Property 5 Limited
Elysium Healthcare Property 6 Limited
Castle Road Homes Limited
Elysium Healthcare Property 7 Limited
Elysium Healthcare Property 8 Limited
Elysium Healthcare LC Limited