

Modern Slavery Statement

(This statement is made pursuant to the Modern Slavery Act 2015 s54(1) and constitutes our statement for the current financial year.)

Our Policies on Slavery and Human Trafficking

The Senior Management of Gray Healthcare Limited are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any of our business dealings and relationships.

Our Modern Slavery and Human Trafficking Policy reflects our commitment to act ethically and with integrity in all our business relationships. We also undertake appropriate due diligence and have effective controls in place to identify potential risk areas and to report and act upon any concerns.

Our Organisation and Structure

Gray Healthcare Limited is a private company founded in 2007 (no. 06382591) that provides a range of flexible individualised care and support services for people with learning disabilities, autism, mental health support needs, acquired brain injuries and other complex needs. We support people each day to live more independent lives within their own homes in a community of their choice.

Our Supply Chains

Gray Healthcare Limited look to source from recognised organisations, vetting them wherever practicable. Our supply chain relates to the provision of goods and services that a social care organisation would normally require, e.g., business support and the supply of labour.

We are committed to ensuring that our supply chains are free of any suggestion of slavery or human trafficking. To ensure this, we seek to work with those organisations that share our values and can demonstrate that they too work ethically and with integrity.

Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our supply chains and workforce and expect suppliers to ensure adherence to our values and ethical standards, vetting for suitability wherever possible.
- We have established appropriate policies and processes within our organisation to make sure that the products we purchase comply with our ethical standards.
- We are committed to ensuring our supply chains are free from modern slavery and human trafficking and seek to work only with those organisations who also want to and can demonstrate they also take the same approach.
- Our Code of Practice provides important guidelines for interactions with colleagues, people we support, suppliers and other business partners. At the core of the Code of Practice and in the company's policies and procedures, we are an equal-opportunities employer committed to creating and ensuring a non-discriminatory and respectful working environment for our colleagues. Our robust recruitment and people management processes are designed to ensure that all prospective colleagues are legally entitled to work in the UK and to safeguard colleagues from any abuse or coercion once in our employment.
- Our Whistleblowing Policy encourages all colleagues to raise concerns including potential violations of the Code of Practice, company policies, and the laws of England and Scotland. We have reporting mechanisms in place to collect and relay information regarding potential violations to appropriate company resources for review and follow-up action.
- We conduct web-based training for colleagues to emphasise the importance of acting with integrity and in line with our principles and Code of Practice.

Supplier Adherence to our Value and Ethics

We have a zero tolerance approach to modern slavery and human trafficking. To ensure all those in our supply chain comply with our values, we have in place a supply chain compliance programme. This involves various internal departments, including human resources, audit, procurement and legal. Wherever possible, we look to establish sound and long-standing relationships with suppliers who understand and share our business and operational values.

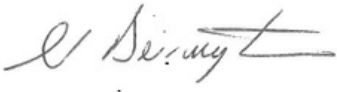
Our Effectiveness in Combating Slavery and Human Trafficking

We continue to review ways in which we can tackle slavery and human trafficking within our sector. We also assess how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or our supply chains. To ensure we remain compliant we:

- Undertake regular reviews of our purchasing processes.
- Ensure that our HR and payroll systems are effective, to identify and report on any potential breach of this legislation.
- Maintain good and open communication within our supply chain to ensure that there is clear understanding of expectations, activity and compliance.
- Ensuring staff are trained and sensitive to the impact of the legislation and its possible impact on our activities.

Management Responsibility

We have ensured that our senior managers have been briefed in respect to this legislation, our organisational responsibility, and what checks we are required to carry out.



Neil Berrington
Clinical Director

31st July 2025