

# Modern Slavery Act Policy and Procedure



Name of Policy & Procedure	Modern Slavery Act & Procedure
Author:	Serenity Integrated Care
Date:	20/07/2022
Policy Review Date:	20/07/2023 (or as required)

## Modern Slavery Act Policy

Serenity Integrated Care is committed to understanding all potential modern slavery risks relating to its business and to ensuring the business and its supply chains are free of modern slavery and human trafficking.

We acknowledge our responsibility to take a robust approach to slavery and human trafficking and to comply with all principles of the Modern Slavery Act 2015. We will not permit or condone any form of slavery, servitude, forced or compulsory labour or human trafficking.

## Purpose

Serenity Integrated Care has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our partners.

## Scope

This policy applies to all persons working for the company or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and the company may amend it at any time.

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## Responsibility

The company managers have day to day responsibility to ensure compliance with our legal and ethical obligation for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## Compliance

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager OR the legal and Compliance Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Legal and Compliance Director or you may report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Legal and Compliance Director.

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. The company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that

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modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise to the HR department.

## **Communication and Awareness**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. The company may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## **Review**

This policy is reviewed annually by Serenity Integrated Care Management Team

Modern Slavery Act Policy 0.3