

## **Anti-Slavery and Human Trafficking Statement**

### **Introduction**

This statement is made of behalf of the board of Salutem LD TopCo Limited with regards to the Modern Slavery Act 2015 which requires employers to be transparent about their efforts to eradicate slavery and human trafficking in their supply chain.

### **Our Structure and Business**

Salutem LD Topco Limited, founded in April 2017, is the holding company of several companies operating across England and Wales in the specialist care space, including Pathways Care Group Limited, Clearwater Care (Hackney) Limited and Modus Care Limited.

The business provides specialist care and support to individuals living with complex health needs, a learning disability or mental health needs.

Each of our brands has a full infrastructure and support centre offering finance, HR, estates, legal, payroll, quality and governance services. This support function is shared with Ambito Care & Education – a sister brand to Pathways Care Group, Modus and Clearwater Care, operating under Salutem LD Topco II Limited. Ambito Care & Education provides care and support in various care settings, including educational settings, to individuals with physical and learning disabilities and complex health needs. We believe that by bringing together lots of specialist brands under one roof we can provide a better, more knowledgeable service for our clients.

Approximately 1510 staff work across all of the organisation's brands in 85 care settings and 126 in our central support function.

### **Our policies in relation to slavery and human trafficking**

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 supply chains.

To ensure our employees are not subject to undue influence and are treated with dignity and respect, we have robust HR policies and procedures in place across all our operations, including eligibility to work in the UK checks for all employees. These are regularly audited to ensure compliance with employment legislation and prevent unethical working practices. We are committed to ensuring that all staff receive fair remuneration for the job they perform and undertake regular reviews of terms and conditions across the workplace.

The Salutem Employee Listening Forum provides all staff with a channel of communication to share their views and concerns anonymously with the executive team.

We have a formal anti-slavery and human trafficking policy in place and awareness of modern slavery/human trafficking responsibilities are shared with all new employees as part of their induction via

inclusion in the staff handbook. Our employee app, Blink, provides direct access to this policy and the staff handbook.

Specific e-learning training is in place and is mandatory for all staff.

Our whistleblowing policy encourages staff to report any bad practice, which extends to human rights violations like modern slavery, on a confidential basis and without fear of recrimination.

Our external Employee Assistance Programme provides confidential information and support by telephone on a wide range of subjects if staff have concerns they do not wish to discuss with their manager.

#### **Our suppliers**

We procure a wide range of goods and services via a diverse supply chain, including the following:

- Temporary/Agency staff
- Property related services and materials (repairs and maintenance)
- Communications and IT equipment services
- Various professional services
- Office equipment and supplies
- Lease vehicles
- Utilities and waste management

Based on published guidance from the GLAA we do not believe there to be any high risk operations within the work of Salutem and its supply chains with regards to modern slavery and human trafficking. We believe there is a potential low risk in the supply chains in the provision of agency staff, waste management and construction workers.

When using agencies and other bodies associated with the employment of staff, we will make sure that steps are put in place to ensure that no modern slavery or human trafficking is taking place in these supply chains. As a matter of course we expect all agencies that supply staff to Salutem to ensure that all staff are vetted and screened in line with best practice and all applicable legislation to ensure the right to work in the UK and their identity using authentic and legal documentation, as well as assessing for any concerning behaviours that may require further review in line with combatting modern slavery.

We continue to review our supply chain broadly to assess product, sector or geographical risks to help identify a clear Modern Slavery Act profile of our Supply Chain. We will be ensuring that any suppliers we use either have a modern slavery statement in place or have completed our questionnaire in relation to modern slavery and human trafficking. We will evaluate the modern slavery and human trafficking risks of each new supplier as part of the procurement process. We are working to ensure that we work only with suppliers who treat their obligations towards modern slavery with the same importance that we do. This work will be monitored, and any areas of concern will be addressed; if appropriate the supplier will be suspended until we are satisfied with their commitment.

We will take appropriate action against any suppliers who have been suspended.

Since our 2023 statement no incidents of modern slavery or human trafficking have been identified or reported within our organisation and we have not had grounds to suspend any suppliers.

Financial year 2023/2024



This statement constitutes our Anti-Slavery and Human Trafficking Statement for the financial year ending 31 March 2024.

Date: 19 August 2024

A handwritten signature in black ink, appearing to read "John Godden", is written over a thin horizontal line.

Signed by John Godden

Chief Executive Officer, Salutem LD Topco Limited

This statement covers Salutem LD TopCo Limited and its subsidiary companies as follows:

Salutem LD BidCo Limited  
Salutem LD BidCo II Limited  
Salutem LD BidCo III Limited  
Salutem Shared Services Limited  
Salutem Shared Services II Limited  
Salutem LD Midco I Limited  
Salutem LD Acer DebtCo Limited  
Pathways Care Group Limited  
Newlife Care Services (Holding) Limited  
Newlife Care Services Limited  
Modus Care Limited  
Modus Care (Plymouth) Limited  
Swan Village Care Services Limited  
Minster Pathways (Colchester) Limited  
Pathways 4 Care Limited  
Pathways Daycare Limited  
Hardriding House Limited  
Clearwater Specialist Care Group Limited  
Clearwater Specialist Care Partners Limited  
Clearwater Specialist Care Enterprise Limited  
Clearwater Care (Group) Limited  
Clearwater Care (Hackney) Limited  
Greenfield Close Residential Care  
TL Care UK Limited  
Amity Residential Care Limited