SALUTEM CARE & EDUCATION

A Salutem Company • We are HumanKind

Anti-Slavery and Human Trafficking Statement Financial Year 2026/2026

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 498 individuals living with complex health needs, a learning disability or mental health needs. We deliver around 66,400 care hours per week across all of our companies.

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 758 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 the individuals we support as well as our clients.

Approximately 1624 staff work across all of the organisation's brands in 129 care settings and 164 in our central support function.

Our policies in relation to modern 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 where possible 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.

Further operational policies relevant to modern slavery prevention are implemented throughout the organisation and include human rights, anti harassment/bullying, a code of conduct for employees and employer, equal opportunities, recruitment, grievance and our expected Salutem Behaviours and Salutem Values. Our employee app, Blink, provides direct access to these policies and the staff handbook. In addition, these policies are mandatory reads for employees and this action is captured by Blink.

Specific external e-learning training is in place and is mandatory for all staff on an annual basis. It includes guidance on how to recognise and report modern slavery and what our responsibilities are, both as an individual and as an organisation.

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 Board Members and Group Executive team provide senior level oversight and governance of modern slavery risk whilst day to day responsibilities are managed by the Chief Corporate Services Officer.

Our suppliers

We procure a wide range of goods and services via a diverse supply chain with a preference for suppliers located in the UK, including the following:

•Temporary/Agency staff

•Property related services and materials (repairs and maintenance)

•Communications and IT equipment services

•Various professional services including legal counsel, auditors and tax advice

•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. We believe there is a 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 that the right to work in the UK and their identity is verified using authentic and legal documentation as well as assessing for any concerning behaviours that may require further review in line with combatting modern slavery. Our organisation underwent an unannounced Home Office compliance visit in relation to our Skilled Worker Sponsorship Licence and fully passed. We retained our A status which has ensured we can recruit individuals requiring sponsorship.

We continue to review our supply chain broadly to assess product, sector or geographical risks to help identify a clear profile of our secondary Supply Chain. As part of that we have increased capacity in Procurement. 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.

In the current financial year we will be increasing engagement with external parties to help us improve our supply chain mapping in more detail. We will also be reviewing our risk assessment methods and introducing relevant KPIs to develop monitoring and evaluation.

Since our previous 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.

This statement constitutes our Anti-Slavery and Human Trafficking Statement for the financial year ending 31 March 2026.

Date: 24 August 2026

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
Pathways 4 Care Limited
Pathways Daycare Limited
Newlife Care Services (Holding) Limited
Newlife Care Services Limited
Swan Village Care Services Limited
Minster Pathways (Colchester) Limited
Modus Care Limited
Modus Care (Plymouth) Limited
Hardriding House Limited
Clearwater Care (Hackney) Limited
Clearwater Specialist Care Enterprise Limited
Clearwater Specialist Care Group Limited
Clearwater Specialist Care Partners Limited
Clearwater Care (Group) Limited
TL Care UK Limited
Amity Residential Care Limited
Greenfield Close Residential Care