

## Akari Care Modern Slavery Act Statement

This statement is made in accordance with section 54(1) of the Modern Slavery Act (2015) and explains the measures that Akari Care Limited and Akari Care Cymru Limited (together “Akari Care”) has taken to prevent modern slavery and human trafficking in its business and supply chain during the last financial year ended 31 October 2021.

At Akari Care, we aim to have transparent business operations and performance. We follow a high set of ethics and values that guide our governance procedures and management decisions. We are committed to operating a business that benefits our residents, employees and the wider community and we take our corporate responsibility obligations very seriously.

During the year, Akari Care has adopted a new set of values and behaviours, following consultation with our colleagues, and our residents and their families. These values and behaviours are consistent with our commitment to preventing modern slavery and human trafficking.

### Our Main Business and Supply Chain

Akari Care is a provider of residential and nursing care services to the elderly operating a number of homes nationally around the UK, within which, care is provided by around 1,800 nursing and care staff. Placements into our services are funded by local authorities, the NHS and self-payers.

Our main supply chain includes food, medical supplies, agency staff, utilities, maintenance services, training services and waste management.

Most of Akari Care’s workforce are directly employed and enjoy full employment rights under UK law.

Akari Care is committed to ensuring, and to improving our practices so that there is no modern slavery or human trafficking in any part of our business, including supply chains and recruitment processes. Akari Care believes in acting ethically and with integrity in all our business relationships to ensure neither modern slavery nor human trafficking are taking place in any part of our business.

Akari Care expects the same high standards from all its suppliers, contractors and other business partners. As part of Akari Care’s procurement processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. Akari Care expects that all our suppliers will hold their own suppliers to the same high standards.

### Our Policies

Akari Care operates several internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. These include:

**Recruitment Policy** – we have a robust recruitment process in place, during which we conduct identification and right to work checks on all our employees. Regular reviews into pay and working conditions are also undertaken.



**Whistleblowing Policy** – we encourage employees to notify management (or our regulators being Care Quality Commission and Care Inspectorate Wales) regarding any concerns or issues, including suspicions of modern slavery, in any parts of our business or supply chains at the earliest possible stage.

**Anti-Bribery and Corruption Policy** – this sets out Akari Care’s expectations of our employees and suppliers in relation to our ethical standards, ensuring fair and transparent working practices at all times.

## Our Due Diligence

During the onboarding process for new suppliers, we ask all potential new suppliers to complete an audit document which sets out their values, policies and procedures across all facets of their business. As a part of this due diligence exercise, we request that potential suppliers provide their policies on anti-slavery and human trafficking, as well as any other policies that show they operate with clear ethical responsibility towards their workforce, and comply with legislative requirements, for example on pay, equal treatment and working conditions. This audit document then enters a cycle of expiration and renewal, dependent upon the criticality of the supplier, whereby the declarations and policy submissions provided by the supplier, are reviewed and refreshed periodically. During the course of the year, we also undertake onsite physical supplier audits at the supplier’s premises, which include checks on our suppliers’ compliance with the Modern Slavery Act, and allows us to investigate and interrogate the responses provided within the audit document.

Akari Care does not support or knowingly deal with any business involved in slavery or human trafficking and will not work with any company in breach of the Modern Slavery Act or identified as having slavery and human trafficking in its business or supply chains.

## Training

To ensure a level of understanding of the risks of modern slavery and human trafficking across our business and in our supply chains, we recognise the importance of training our staff. During the year, our functional heads and Directors have received training, from our legal advisers, on Modern Slavery which included:

- Responsibilities relating to the Modern Slavery Act including reporting obligations;
- Identifying and assessing modern slavery risks including employment, recruitment, geographic, sector and supplier risks; and
- Auditing risks.

## During the Past Year

As part of our ongoing commitment to preventing modern slavery and human tracking, during the past year, we have undertaken the following actions:

- Training for senior leadership team in the business;
- Updated risk based reviews of our suppliers and their risk rating;
- Review and update, where appropriate, of all our policies;
- Audit of our largest suppliers of medical consumables and fire system services;
- Further investment in our central recruitment function which continues to give enhanced visibility over right to work and identification checks for all new employees.



During the year, we identified concerns in relation to the welfare of certain agency workers who had been provided by a third party agency. We reported these concerns initially to the Police and subsequently also made our Regulator and relevant Local Authority aware of our concerns. We have ceased using the related third party agency.

### **Board Approval**

This statement has been approved by the Board of Directors of Akari Care.

Oliver Lightowlers  
**Chief Executive Officer**  
7 July 2022

