



Last Reviewed: May 2023

Last Amended: Next Planned Review in 12 Months

## **Aviteus Healthcare Ltd**

### **MODERN SLAVERY (ANTI SLAVERY AND HUMAN TRAFFICKING) POLICY**

#### **PURPOSE**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Aviteus Healthcare 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 supply chains.

The Aviteus Healthcare is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting 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, and we expect that our suppliers will hold their own suppliers to the same high standards.

#### **SCOPE/TO WHOM THIS POLICY APPLIES**

This policy applies to all persons working for the Aviteus Healthcare 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 Aviteus Healthcare may amend it at any time.

Registered in England and Wales | Reg. No:13337393

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## RELATED POLICIES AND PROCEDURES

This Modern Slavery (Anti-Slavery and Human Trafficking) Policy interacts with the following workplace policies and procedures which can be found in SharePoint. You are encouraged to familiarize yourself with the policies detailed below. If you have any queries about this policy, please contact the Legal and Compliance Director.

- Whistleblowing policy

## RESPONSIBILITY FOR POLICY

The Aviteus Healthcare Governors have overall responsibility for ensuring this policy with senior management; and managers have day to day responsibility to ensure compliance with our legal and ethical obligation

The Legal and Compliance Director has primary and day-to-day responsibility 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.

In our commitment to the well-being of our agency workers and the promotion of ethical practices, Aviteus Healthcare Ltd. has implemented robust policies and processes aimed at spotting and supporting victims of modern slavery. Recognizing the importance of this issue, we have established the following measures:

### Training and Awareness:

Aviteus Healthcare Ltd. ensures that all staff undergo comprehensive training on identifying signs of modern slavery. Our training programs cover the various forms of exploitation, indicators of abuse, and the importance of vigilance in safeguarding our workforce.

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### **Client Due Diligence:**

We conduct thorough due diligence on clients and employers to guarantee ethical and legal compliance. This includes verifying business legitimacy, adherence to labor laws, and regular audits of workplaces to identify potential signs of exploitation.

### **Whistleblowing Mechanism:**

Aviteus Healthcare Ltd. has implemented a confidential whistleblowing mechanism to encourage employees and agency workers to report concerns related to modern slavery. This system ensures anonymity and protection against reprisals.

### **Collaboration with Authorities:**

We actively collaborate with law enforcement agencies, NGOs, and relevant organizations to share information and address cases of modern slavery. Aviteus Healthcare Ltd. is committed to reporting suspicions and cooperating fully with authorities during investigations.

### **Documentation and Record-Keeping:**

Our agency maintains meticulous records of workers, including contracts, working hours, and accommodation details. This documentation is essential for identifying patterns of exploitation and ensuring compliance with employment standards.

### **Victim Support Services:**

Aviteus Healthcare Ltd. is dedicated to providing comprehensive support services to victims of modern slavery. We work closely with local NGOs and government agencies to ensure that survivors receive the necessary assistance, including legal advice, medical support, and counseling.

### **Regular Review and Improvement:**

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We regularly review and update our policies and processes to adapt to evolving circumstances and emerging threats related to modern slavery. Feedback from workers, staff, and external stakeholders is actively sought to enhance the effectiveness of our anti-slavery measures.

#### **Ethical Recruitment Practices:**

Aviteus Healthcare Ltd. is committed to ethical recruitment practices, including transparent job offers, fair wages, and clear terms and conditions of employment. These practices are integral to preventing the exploitation of workers from the outset.

At Aviteus Healthcare Ltd., we believe that a proactive and collaborative approach is essential to address modern slavery effectively. Our dedication to these policies and processes underscores our commitment to the well-being and safety of all individuals associated with our agency.

#### **COMPLIANCE WITH THIS POLICY**

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.

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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 Aviteus Healthcare is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that 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 it formally using the Grievance Procedure which can be found in SharePoint or from the HR department.

## COMMUNICATION AND AWARENESS OF THIS POLICY

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.

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## BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The Aviteus Healthcare may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

Dt - 10<sup>th</sup> May 2023

Director - Vikas Kumar Pandey

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