

Anti-slavery and anti-trafficking statement and policy

Lead responsibility:

The Board of Swiis International Limited

Approved by:

The Board of Swiis International Limited

Chief Human Resources Officer

Chief Operating Officer

Operational from:

October 2018

Review due:

September 2027

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken by Swiis International Limited and the companies covered by this statement during the financial year commencing 1 October 2026 and ending 30 September 2027 to identify, prevent and mitigate the risks of slavery, servitude, forced or compulsory labour and human trafficking within our business and supply chains.

For the purposes of this statement, “modern slavery” includes slavery, servitude, forced or compulsory labour and human trafficking as defined by the Modern Slavery Act 2015.

Swiis International Limited is committed to conducting its business ethically, responsibly and with integrity. We have zero tolerance for modern slavery or human trafficking in any part of our organisation or supply chains. We expect equivalent standards from those who work with us, including suppliers, contractors, consultants, labour providers, payroll intermediaries and other business partners.

This is a group statement covering:

- Swiis International Limited;
- Swiis (UK) Limited, trading as Swiis Healthcare;
- Swiis Foster Care Limited;
- Swiis Training;
- London Nurses Agency (LNA); and
- Swiis Foster Care Scotland Limited.

We operate from 11 UK sites and employ over 150 staff. Our services include independent fostering, healthcare staffing, and training solutions for public and private sector clients.

We are committed to ethical business practices and oppose all forms of modern slavery and human trafficking. We expect the same commitment from our suppliers, contractors, and partners.

Approval and responsibility

The Board of Swiis International Limited has overall responsibility for the Group’s approach to preventing modern slavery and human trafficking.

Operational responsibility is shared by the Chief Executive Officer, Chief Operating Officer, Chief Human Resources Officer and the relevant operational, recruitment, compliance, finance and procurement leads.

Managers are responsible for ensuring that the requirements of this statement and associated policies are implemented within their areas of responsibility. All employees and workers are expected to remain alert to indicators of exploitation and to report concerns promptly.

This statement was approved by the Board of Swiis International Limited on **9th September 2026**.

Our organisational structure and business

Swiis International Limited is the parent company of a UK-based group providing services to public and private sector clients.

Our principal activities comprise:

- independent fostering services in England and Scotland;
- temporary healthcare staffing and workforce solutions;

- permanent recruitment and staffing services;
- training and consultancy services; and
- associated corporate, administrative and support services.

Our clients include local authorities, NHS organisations and private sector organisations.

Swiis principally operates within the United Kingdom. Although our direct operations are UK-based, goods and services used by the Group may have extended or international supply chains.

Our operating model includes directly employed staff, temporary workers, consultants, foster carers, suppliers and contractors. Swiis Healthcare may also interact with employment intermediaries and umbrella companies as part of its labour supply chain.

Our supply chains

Our supply chains include both the goods and services required to deliver our principal activities and the services supporting our wider business operations.

The principal categories include:

- labour, recruitment and payroll intermediaries, including umbrella companies;
- temporary staffing and workforce-related services;
- professional, clinical and regulatory services;
- information technology, software, telecommunications and digital services;
- vetting, identity checking, employment screening and compliance services;
- training and consultancy;
- office equipment, computers and other electronic goods;
- property, facilities management, maintenance, cleaning and security services;
- marketing, printing and communications services; and
- other professional and corporate support services.

We recognise that risks may exist beyond our direct, or Tier 1, suppliers. This may include subcontractors, labour providers and the manufacturers or distributors of products procured through UK-based suppliers.

During the reporting period, Swiis used a New Supplier Set-Up and Due Diligence Form that requested information about legal and regulatory compliance, data protection, social value, ethical labour practices, modern slavery commitments and payment of at least the applicable national minimum wage.

Our policies

Our approach is supported by policies and procedures that establish expected standards of conduct, provide reporting routes and help manage the risks of exploitation.

Relevant policies and procedures include:

- Anti-Slavery and Anti-Trafficking Policy;
- Whistleblowing Policy;
- Whistleblowing and Malpractice Policy and Procedures;
- Safer Recruitment Policy and Procedures;
- Safeguarding Policies;

- Recruitment and employment screening procedures;
- Equality and equal opportunities policies;
- Anti-Bribery and Corruption Policy;
- Dignity at Work and anti-harassment policies;
- complaints and allegations procedures;
- supplier onboarding and due diligence arrangements; and
- policies governing the use of intermediaries and umbrella companies.

The Swiis safer recruitment arrangements support the verification of identity, employment history and suitability. The Group's healthcare compliance procedures also include identity, right-to-work, criminal record and professional registration checks.

Workers may raise concerns through Swiis whistleblowing arrangements. The Whistle Blowing Policy provides that concerns will be investigated promptly and confidentially and that workers will not be victimised for raising legitimate concerns. A protected disclosure form is also available to employees, contractors and agency workers.

Breaches of our policies may result in investigation and, where appropriate, disciplinary action, termination of a commercial relationship, referral to a regulator or reporting to law enforcement.

Risk assessment

We recognise that modern slavery can occur in the UK as well as overseas and that a lack of identified cases does not necessarily indicate an absence of risk.

We assess modern slavery risk by considering factors including:

- the nature of the goods or services supplied;
- reliance upon temporary, casual, migrant or otherwise potentially vulnerable labour;
- use of employment agencies, labour providers, payroll intermediaries or umbrella companies;
- the use of subcontractors or extended supply chains;
- the country in which goods are manufactured or services delivered;
- the transparency and complexity of the supplier's ownership and operating structure;
- exceptionally low prices or commercial terms that may place pressure on wages or working conditions;
- payment practices, deductions, recruitment fees or arrangements that may create worker indebtedness;
- the supplier's policies, controls, accreditations and willingness to provide evidence;
- previous allegations, regulatory action, adverse information or audit findings; and
- access to effective reporting mechanisms for workers.

Areas of potentially higher risk

We have identified the following areas as requiring particular attention:

Labour supply chains and temporary staffing

The recruitment and supply of temporary workers can involve several parties, including recruitment businesses, master or neutral vendors, end clients, payroll providers and umbrella companies. Longer or less transparent labour supply chains can reduce visibility over employment conditions, deductions, worker communications and the identity of the employing entity.

Umbrella companies and payroll intermediaries

Potential risks include opaque ownership, unexplained deductions, withheld pay, misleading payslips, disguised remuneration, rapid corporate changes, worker debt or dependency, and the use of undisclosed associated companies or subcontractors.

During the reporting period, Swiis strengthened its approach to umbrella-company oversight, including reviewing its provider panel, carrying out enhanced due diligence and introducing planned monthly compliance reporting, payroll audits and enhanced monitoring.

Recruitment and employment of workers

People seeking employment may be at increased risk where they are recruited through third parties, are unfamiliar with UK employment rights, have limited English, rely on another person for accommodation or transport, or believe they must pay fees to obtain work.

Facilities and lower-paid outsourced services

Cleaning, maintenance, security, logistics and other labour-intensive outsourced services may involve subcontracting, temporary labour or less visible employment arrangements.

Information technology and manufactured goods

Computers, telephones, electronic equipment and office goods may contain components or materials sourced through complex international manufacturing and distribution chains. Our visibility below the direct supplier level may be limited.

Professional and digital services

Although these services may present a lower inherent labour exploitation risk, subcontracting, offshoring and limited visibility of supporting labour can create residual risk.

Due diligence

We apply a risk-based approach to due diligence. The level of review is proportionate to the nature of the supplier, the services or goods provided and the identified risk.

Our controls include, as appropriate:

Recruitment and workforce checks

- verifying an individual's identity;
- carrying out right-to-work checks before work commences;
- checking employment history and references;
- undertaking criminal record and professional registration checks where required;
- checking that the individual presenting for work is the individual who completed the recruitment process;
- seeking explanations for material inconsistencies or gaps;
- maintaining recruitment and compliance records; and
- escalating signs of coercion, identity control, exploitation or third-party interference.

Supplier onboarding

Potential suppliers may be required to provide:

- legal name, registration and ownership details;
- registered and trading addresses;
- information regarding services and proposed subcontracting;
- relevant policies, certifications and assurances;
- information about their approach to modern slavery and ethical labour;

- confirmation of compliance with employment and minimum wage requirements;
- details of regulatory or legal concerns; and
- a declaration completed by an authorised representative.

Risk-based enhanced due diligence

Where a supplier or arrangement is assessed as presenting increased risk, we may:

- request the supplier's modern slavery statement or policy;
- seek information concerning workforce composition and recruitment channels;
- investigate ownership, associated companies and subcontractors;
- review employment models, worker documentation and payment arrangements;
- require evidence supporting pay, tax and employment compliance;
- conduct credit, registry, regulatory or adverse-information checks;
- request an independent audit or accreditation report;
- obtain sample records or management information;
- require completion of an enhanced due diligence questionnaire;
- impose a corrective action plan;
- suspend onboarding, deployment or payment while material concerns are investigated; or
- decline, suspend or terminate the relationship.

Contractual requirements

Where proportionate and appropriate, contracts require suppliers to:

- comply with applicable laws relating to modern slavery, human trafficking, employment and worker protection;
- maintain suitable policies, procedures and records;
- provide information requested for assurance purposes;
- notify Swiis of relevant concerns, investigations or breaches;
- apply equivalent expectations to subcontractors;
- co-operate with audits and corrective action; and
- remedy breaches within an agreed period.

Serious or persistent non-compliance may result in suspension or termination of the relationship.

Responding to concerns and remediation

Modern slavery concerns must be treated as safeguarding and potential criminal matters. The safety and welfare of a potential victim will take priority.

A member of staff who sees or receives information suggesting modern slavery, trafficking or exploitation must report the concern promptly through their manager, safeguarding lead, HR, compliance team or the Group's whistleblowing arrangements, depending on the circumstances.

Where there is an immediate risk of harm, the emergency services should be contacted.

Our response may include:

- protecting the individual from immediate harm;
- preserving confidentiality so far as lawful and practicable;
- avoiding action that could increase the risk to a potential victim;
- securing and preserving relevant records;

- escalating the concern to senior management and appropriate safeguarding leads;
- obtaining specialist, safeguarding or legal advice;
- making a referral or report to the appropriate statutory authority;
- investigating the supplier or employment arrangement;
- suspending relevant activity where necessary;
- requiring corrective action and monitoring its completion; and
- reviewing whether controls should be improved across the wider business or supply chain.

Any response will be proportionate, victim-centred and designed to avoid unintended harm.

Training and capacity building

Our training arrangements are intended to help staff understand, recognise and respond to modern slavery and human trafficking.

The current Swiis programme includes an online human trafficking and modern slavery module for staff, safer recruitment and right-to-work training for recruitment and HR teams, and targeted ethical sourcing and supplier due diligence training for finance and procurement staff.

Training covers, as appropriate:

- the meaning and forms of modern slavery;
- slavery, servitude, forced or compulsory labour and human trafficking;
- the distinction between human trafficking and people smuggling;
- indicators of coercion, debt bondage, exploitation and control;
- indicators within recruitment and labour supply arrangements;
- right-to-work and identity verification;
- the role of intermediaries and subcontractors;
- how to respond to a disclosure or concern;
- internal escalation and whistleblowing arrangements;
- safeguarding considerations;
- the National Referral Mechanism; and
- the importance of accurate recording and confidentiality.

Enhanced or role-specific training is provided, or made available, to those with responsibility for:

- recruitment and onboarding;
- temporary worker compliance;
- human resources;
- safeguarding;
- procurement and supplier management;
- finance and payroll;
- contract management; and
- investigating or escalating concerns.

Monitoring our effectiveness

We recognise that policies and training do not, on their own, demonstrate effective prevention. We therefore monitor implementation through management information, assurance activity, reported concerns, audit findings and corrective actions.

Our performance indicators include:

1. percentage of required employees completing modern slavery training;
2. percentage of relevant recruitment, compliance, procurement and finance staff completing role-specific training;
3. percentage of new direct suppliers completing the supplier due diligence process;
4. percentage of suppliers assessed as higher risk that receive enhanced due diligence;
5. number of supplier reviews or audits undertaken;
6. number and nature of modern slavery concerns raised;
7. number of substantiated concerns or identified cases;
8. number of corrective action plans issued and completed;
9. percentage of relevant supplier contracts containing modern slavery compliance provisions;
10. percentage of approved umbrella companies completing required periodic due diligence;
11. number of recruitment or right-to-work exceptions identified and resolved; and
12. progress in improving visibility below Tier 1 suppliers.

No confirmed instances had been identified at the time this statement was produced.

Progress during 2025/26

During the reporting period, the Group:

- maintained modern slavery training and awareness arrangements;
- continued safer recruitment, identity and right-to-work controls;
- used supplier onboarding documentation addressing modern slavery and ethical labour;
- reviewed risks relating to temporary labour and payroll intermediaries;
- strengthened planned oversight of umbrella companies through enhanced due diligence and monitoring;
- maintained whistleblowing and protected disclosure arrangements; and
- reviewed its modern slavery reporting against the six section 54 reporting areas.

Priorities for 2026/27

In the next reporting period, we intend to:

- complete implementation of a documented supplier modern slavery risk-rating methodology;
- improve recording of the geographic and subcontracting profile of higher-risk suppliers;
- establish periodic review frequencies based on supplier risk;
- strengthen contractual provisions and audit rights for relevant suppliers;
- complete enhanced assurance of approved umbrella companies and other labour intermediaries;

- improve Board reporting against the indicators in this statement;
- monitor training completion and introduce targeted refresher activity;
- continue developing visibility beyond direct suppliers where proportionate;
- formalise the recording and tracking of supplier corrective actions; and
- review this statement and the underlying risk assessment at least annually.

These commitments will be monitored by the responsible operational leads and reported to the Board.

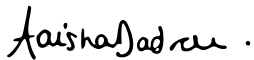
Board approval and signature

This statement has been approved by the Board of Swiis International Limited in accordance with section 54(6) of the Modern Slavery Act 2015.

Signed:



Dev Dadral
Group Chairman
09/09/2026



Aaisha Dadral
Chief Executive Officer
09/09/2026