



HALLMARK

LUXURY CARE HOMES

SLAVERY AND HUMAN TRAFFICKING STATEMENT 2025

April 2025

BACKGROUND

The Hallmark Care Homes Group is a provider of multi-award-winning care services. We have 22 care homes across England and South Wales, as well as a later living community and a domiciliary care service. We are recognised in the industry for providing high quality care and innovative facilities. We pride ourselves on our vision *'to be recognised as the leading provider of high quality, relationship-centred care for all residents'* and we have a long history of a culture rich in values and the Hallmark Luxury Care Homes Charter is testament to this. Our organisational values of growth, openness, togetherness, individuality and quality, demonstrate what is important to us as a Group.

The Modern Slavery Act 2015 requires commercial organisations operating in the UK, with an annual turnover in excess of £36 million, to produce a slavery and human trafficking statement at the end of each financial year. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Hallmark Care Homes Group Holdings Limited and subsidiary companies' ('Hallmark Luxury Care Homes') slavery and human trafficking statement for the financial year ending 31 March 2025. It demonstrates the steps Hallmark Luxury Care Homes has taken, and will continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Hallmark Luxury Care Homes has zero tolerance to slavery and human trafficking in all its business dealings. We are also committed to the prevention of slavery and human trafficking, in all its forms. We will not tolerate or condone it within any part of our business or supply chain.

DUE DILLIGENCE OF SUPPLY CHAINS

In the third quarter of this financial year, we invited suppliers to complete a survey and produced a report on the responses received which includes:

- The current processes to ensure that human trafficking and slavery do not exist in the supplier's operations and supply chain.
- Whether suppliers work with a third party to identify the overall risks of slavery and human trafficking in their supply chain.
- Whether suppliers conduct independent, unannounced audits of their operations and suppliers.
- Whether suppliers require their direct suppliers to certify that all materials incorporated into their final product were sourced, processed, and manufactured in compliance with the human trafficking and slavery laws of the country, or countries, in which they operate.
- The company's standards on human trafficking and slavery.
- Whether management employees, particularly those in charge of supply chain management, have been trained to understand what slavery and human trafficking are and how to mitigate the risk of them in their respective supply chains.

This survey did not identify any concerns. We will conduct this survey again in the 2025/2026 financial year and will review all responses, as well as acting on any concerns we have.



Our Procurement policy continues to ensure that adequate procurement pricing and prompt payment is in place.

POLICIES AND PROCEDURES

Our policies continue to refer to modern slavery, where applicable. This is being added to relevant policies, when they undergo their next review. However, this is already included in key policies.

Our Grievance policy details how formal concerns can be raised and how they will be investigated and responded to.

Version 5 of our Whistleblowing policy was released in February 2025 and details the different whistleblowing pathways open to team members, should they have any concerns. Team members can raise concerns of any nature internally to our Chief Executive Officer, or to an independent Whistleblowing Lead. This version of the policy also explicitly details that concerns regarding modern slavery should be reported.

RISK ASSESSMENT AND MANAGEMENT

The risks linked to modern slavery have continued to be assessed and managed on a biannual basis, via the Group's Risk Management Committee. The risks, along with existing and required control measures, are included on the Group's organisational risk register. These are reviewed ahead of each meeting and modern slavery, as a topic, was discussed by the Committee in April and October 2024. A formal report was submitted to the Committee by our Head of Quality and Compliance, to update them on the progress that was being made in this area and how any risks are being mitigated.

EFFECTIVE ACTION TAKEN TO ADDRESS MODERN SLAVERY

There have been no disclosures or any identified instances of modern slavery within the Group to date.

The Modern Slavery working group has met regularly throughout the financial year to review progress the organisation has made against the organisational action plan.

We also conduct payroll checks, annually, to ensure that no team member is having their salary paid to someone else, against their wishes. There were no concerns with outcome of the checks completed in March and April 2025.

Owing to the existing systems we have in place and the progress made as highlighted in this statement, we are confident that should disclosures be made, we have appropriate systems and processes in place to ensure corrective action is taken promptly.



TRAINING

We have provided an information factsheet to all team members previously, alongside the Home Office's 'Modern Slavery awareness and victim identification guidance' booklet. This is on prominent display in the team area in each of our services and is checked during annual Compliance Audits. A copy is also available via our internal governance system.

We have previously developed a bespoke modern slavery e-learning module for the managers of our services. This training was launched in 2022 and covers:

- The forms modern slavery can take.
- The relevant legislation.
- The signs line managers should look out for.
- How concerns can be reported.
- Our organisational response to modern slavery.

APPROVAL

This statement has been formally approved by the Executive Leadership Team of Hallmark Care Homes Group Holdings Limited (and subsidiaries) and signed on their behalf.



Aneurin Brown
Chief Executive Officer
08 May 2025

