

Slavery and Human Trafficking Statement 2021 Hallmark Care Homes Group Holdings Limited and subsidiary companies (‘Hallmark Care Homes’)

Hallmark Care Homes is a family-run provider of multi-award-winning care homes. We have 20 care homes across England and South Wales and 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’. [The Hallmark Care Homes Charter](#) enshrines our key values and establishes our organisational culture.

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 our Group's slavery and human trafficking statement for the financial year ending 31 March 2021. It demonstrates the steps Hallmark 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 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.

Structure and supply chains

In the 2019/2020 financial year we invited suppliers to complete a survey, and produced a report on their organisational structure and supply chains.

Owing to the COVID-19 pandemic, we were unable to re-survey suppliers in the 2020/2021 financial year. However, our main suppliers did not change during this period and would have been invited to complete the survey in the previous financial year. We will conduct this survey again in the first quarter of the 2021/2022 financial year, reviewing information returns and acting on any concerns these may highlight.

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

Policies and procedures

We have reviewed a number of our policies, and the processes associated with them, to ensure they include reference to the duties of the organisation and individual team members and, where applicable, information on the Modern Slavery Act. These policies include:

- Whistleblowing policy

- Recruitment policy
- Equality and Diversity policy
- Learning and Development policy
- Grievance policy
- Bullying and Harassment policy

Our reviewed Whistleblowing policy was released in August 2020 and details the different whistleblowing pathways open to team members, should they have any concerns. The remaining policies will be released in the first quarter of the 2021/2022 financial year.

Due diligence

As mentioned previously, in the 2019/2020 financial year, we invited suppliers on their modern slavery practices. Following this, we were able to assess:

- 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.

Following this, we reviewed the information received by suppliers and this did not identify any modern slavery or human trafficking concerns. Neither were there any suppliers that completed the survey, which we deemed to be high risk with regards to slavery or human trafficking. Owing to the COVID-19 pandemic, we were unable to re-survey suppliers in the 2020/2021 financial year. However, our main suppliers did not change during this period and would have been invited to complete the survey in the previous financial year. We will conduct this survey again in the first quarter of the 2021/2022 financial year.

Risk assessment and management

The risk linked to modern slavery have continued to be assessed and managed via the Group's quarterly Risk Management committee. The risks, along with existing and required mitigating controls, are included on the Group's organisational risk register. These are reviewed ahead of each meeting and modern slavery, as a topic, was discussed at the meeting in June 2020.

Effective action taken to address modern slavery

There have been no disclosures or any identified instances of modern slavery within the company to date. We have whistleblowing procedures in place which allow our team to raise concerns of any nature internally to our Managing Director, or to an independent Whistleblowing Lead.

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 2021.

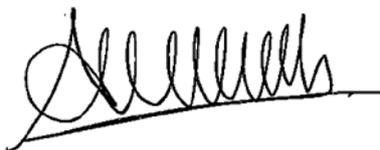
Owing to the existing systems we have in place and the progress made as highlighted in this statement, we are confident that should disclosures be made, we have appropriate systems and processes in place to ensure corrective action is taken promptly.

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. The most recent version of our internal factsheet was circulated in September 2020. This is on prominent display in the team area in each of our care homes and is checked during annual quality assurance audits. A copy is also available via our internal intranet.

Modern slavery is addressed as part of our company induction for care team members. In the 2021/2022 financial year, we intend on creating training specifically for senior leaders in the organisation, on modern slavery and human trafficking and the signs to look out for.

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



Avnish Goyal
Executive Chairman
30 March 2021