MODERN SLAVERY AND HUMAN TRAFFICKING



Statement

DOCUMENT APPROVED BY: David Holmes, Peak15 Chairman

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INTRODUCTION

Modern slavery is an abhorrent crime and a violation of basic human rights. It is a complex, global issue, which takes many forms and includes human trafficking, forced labour and servitude. Peak15's position remains clear: modern slavery has no place within our organisation and we expect those who work with and for Peak15 to uphold and respect these standards.

Peak15 strives to operate to the highest ethical standards in all our work, in our business dealings and wider relationships.

We are very aware that the ongoing Covid-19 global pandemic has created, and continues to create, additional dangers for the victims of modern slavery in the UK. Peak15 has a responsibility to always be alert to emerging modern slavery and human trafficking risks, and we continue to take steps proactively to further develop our understanding and mitigation of modern slavery risks within our organisation and beyond.

This statement provides some background to our organisation and our supply and funding chains. It also sets out the work that we have taken to ensure that slavery and human trafficking are not taking place, either in our organisation or within our supply and funding chains.

ORGANISATION'S STRUCTURE

We are a provider of Services in the Health & Social Care Sector. The Group has over 300 employees and operates across Surrey and Sussex.

OUR BUSINESS

Our business is organised into four business units: Peak15 Ltd, Peak15 Property Services Ltd, Peak15 Business Services Ltd and The Butterfly Project Horsham Ltd.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in any part of our business. We continuously review and update all our policies.

This statement and Policy reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We understand that the following areas could potentially give rise to the highest modern slavery risks:

- Recruitment and on-boarding of staff to work in Services
- Supply of additional support staff from external agencies

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As part of our initiative to identify and mitigate risk we carry out the following:

- ✓ Diligent recruitment processes, with tight consistent reviews on Rights to Work, referencing and review of additional work carried out in additional to potential work at Peak15.
- ✓ Annual reviews with Agencies to understand their practices and training. Only Agencies who satisfy this annual tender process are selected as a preferred supplier to Peak15.
- ✓ Fully support and protect whistle blowers in line with our Policy.
- \checkmark The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.
- √ The Company's due diligence process includes: building long-standing relationships with suppliers and making clear our expectations evaluating the modern slavery and human trafficking risks of each new supplier invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide regular training to our staff.

PERFORMANCE INDICATORS

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including:

- requiring all staff to have completed training on modern slavery
- use of labour monitoring and payroll systems

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31.03.23.

Chairman Signature:

Davil Holney

Peak15 Group Date: 01.04.22