

Modern Slavery Statement

2026 Statement for period April 2025 / March 2026

Eradicating Modern Slavery - our Continued Commitment

We understand that 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 to personal or commercial gain.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. We are equally committed 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.

To that end, we ensure 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 have a philosophy of continuous improvement and development, and are continuing to develop our approach, as this statement lays out.

1 THE BUSINESS, ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

1.1 The Business

A flourishing, private senior living group, offering state-of-the-art residences, premium facilities and exceptional services for over 65s. We pride ourselves on delivering innovative, personalised care with a real emphasis on celebrating the lives of each and every one of our residents. Our Board of Directors is passionate about the care we give, and leads by example.

1.2 Organisational Structure

The Care Home Managers within Sanders Senior Living report to an Operational Director, who reports into, and is supported by, the Board of Directors. A wider support team is in place with specialists in key roles.

Our senior team are dedicated to upholding and building on our values, with a commitment to an exceptional employee experience, from application stage through to training, development and long term development. Our processes are continuously being reviewed and improved.

1.3 Supply Chains

Our policy and our statement apply to all stakeholders and persons working for us or on our behalf in any capacity, including and not limited to employees at all levels, directors, officers, agency workers, seconded workers, volunteers, apprentices, contractors, external consultants, third-party representatives and business partners.

We expect the same high standards from all our contractors, suppliers and other business partners, and 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.

We are committed to ensuring that our suppliers reflect our philosophies on Modern Slavery, and comply with the Modern Slavery Act 2015.

As such:

- All agreements to supply go through the Head Office Procurement Department for due diligence checks.
- All existing suppliers have been issued with our statement and have confirmed their compliance.
- No new supplier will be engaged until they have evidenced their adherence to the legislation.

Our Modern Slavery Policy, incorporating our third party policy, has been shared with our suppliers.

2 POLICIES / PRACTICES

We are ISO 9001 registered and have a suite of policies in place to cover all requirements. These policies are published on our e-learning bookshelf for access for all staff.

Our Modern Slavery Policy encompasses all stakeholders to the business and, in addition to laying out our principles, encourages any concerns to be raised relating to any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier.

In addition, the following relevant policies are in place and regularly reviewed:

- Recruitment Policy
- Pre-Employment Checks Policy
- Working Hours Policy
- Whistleblowing Policy
- Grievance Policy
- Dignity at Work and Bullying and Harassment Policy
- Equality Policy
- Code of Conduct
- Disciplinary and Dismissal Policy

We have in place a variety of actions to promote Whistleblowing and the raising of concerns: Whistleblowing is actively promoted in staff meetings and details are published on the notice boards throughout our Homes. Annual confidential staff surveys give employees an opportunity to comment on all aspects of the business and their individual home. Ad hoc follow up surveys and HR surgeries give further opportunity to raise any concerns or issues.

3 RISK ASSESSMENT AND MANAGEMENT

Our ongoing actions are assessed against policy. Going forward our actions will be assessed through Risk Assessment against the action plan published on the previous year's Modern Slavery Statement.

As a part of our risk assessment, we include our actions to mitigate any risk, including:

- Monitoring adherence to policy and ensuring all stakeholders to the business know how to raise any concern
- Due diligence processes for any new supplier
- Training of staff
- Regular monitoring by the review group

4 DUE DILLIGENCE PROCESSES

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We only use approved staff agencies that have evidenced their Modern Slavery Policy and their adherence to the requirements of the Modern Slavery Act 2015, and to confirm that these philosophies pass down the chain to their suppliers.

For recruitment of overseas candidates, we only recruit from agencies on the Ethical Recruiters List.

5 TRAINING ON MODERN SLAVERY AND TRAFFICKING

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and further regular training is provided as necessary.

All staff are issued with a copy of the Home Office “Modern Slavery Awareness and Victim Identification Guidance”, which also forms part of our new starter documentation. File audits monitor for evidence of distribution.

6 MONITORING, EVALUATION AND CONTINUOUS DEVELOPMENT

6.1 Previous initiatives to support promotion of our values

- Our Employee Assistance Programme supports our team members and gives them an additional avenue for raising concerns confidentially – this resource is actively promoted within the Group.
- The Modern Slavery Review Group, comprising representatives from HR, Recruitment, Governance and Procurement, continues to carry out annual reviews of our Statement.
- Awareness is promoted through direct email campaigns to all staff.
- Review of all training platforms carried out to raise awareness and embed our principles within the workforce.
- Issued the new Runwood Third Party Supplier Modern Slavery Policy to all suppliers to reinforce our philosophy.
- Requested Third Party Supplier Modern Slavery Policies, or requested confirmation of adherence to our Third Party Supplier Modern Slavery Policy.
- Raised awareness of Modern Slavery policy and procedures with care home staff from induction stage, including signposting external sources of support (ie, the Modern Slavery Helpline).
- The annual staff survey which incorporates a section on the effectiveness of our Company’s communications and awareness initiatives relating to Modern Slavery and Human Trafficking.

- Surveys carried out for new team members on induction, reviewing support and engagement.
- Review of Company policies within a new framework.
- Audits to ensure the Modern Slavery information packs have been issued to new staff.
- PSL for agency staff reviewed with enhanced checks and an audit carried out. .
- Alerts for new starters to relevant departments to ensure support in onboarding and training provision.
- Reviewed Home Office Statutory Guidance on Transparency in Supply Chains (TISC) against Company Practices, and reorganisation of our Statement to reflect the general principles.
- Continued assessment of new starter experience through direct surveys, with ad hoc individual surveys carried out as required.
- Merged our Modern Slavery Policy and the Third Party Modern Slavery Policy into one document for ease of reference for all stakeholders to the business.
- Review of the Staff Handbook to incorporate a new, dedicated section on Modern Slavery awareness.
- Awareness initiatives through Company Newsletter and direct messages to staff.
- Information packs reviewed and re-issued, and integrated into the electronic recruitment platform for new team members at offer stage, with alerts to potential fraud, abuse of power, or “scams”, with details of who to contact in the event of any concerns, and a re-assurance of support.

6.3 Continued Action Plan for 2026

- Introduce 7 Minute Meetings covering varying aspects of Modern Slavery awareness.
- Re-issue expectations to our supply chain.
- Ad hoc surveys and communications to colleagues with Visa status to promote confidence in reporting any perceived concerns
- Require suppliers to declare any instances or concerns within their organisations of Modern Slavery

6.4 Key performance indicators to measure effectiveness of steps being taken

- Monitoring training compliance through our electronic training platform.
- Monitoring and logging any declarations of Modern Slavery within the business or supply chains and any associated risk assessments.
- Monitor staff awareness through a dedicated assessment section in the Annual Staff Survey.

6.5 Declaration of Modern Slavery within the Business or our supply chains

There have been no such notifications during the reporting period April 2024 to March 2025. We have a robust investigations strategy in place for any such notifications.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the Company’s slavery and human trafficking statement for 2021.

On behalf of the Board of Directors