

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2018/19

Anti- Slavery Commitment

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Avery Healthcare Holdings Limited (and all subsidiary and associated companies, listed below in Appendix A- collectively “Avery Healthcare”) have taken to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Our Business

Avery Healthcare provides residential, nursing and dementia care across England. The care is provided in hotel style accommodation which offers private, Local Authority and CCG funded places.

Our Policies

We operate a number of policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Recruitment Policy
- Whistleblowing Policy
- Equality and Diversity Policy
- Staff Code of Conduct

To support the implementation of these policies we provide advice, guidance and support to all staff. We also publish a Modern Slavery Statement on our website and on our intranet, which is available to all staff.

Our Supply Chains

Avery Healthcare's supply chains include a number of business functions including financial, IT, staffing and building & maintenance.

In order to ensure that those within our supply chain comply with our values we ensure the below:

- Each supplier has their own anti-slavery/human trafficking policy
- Each supplier monitors potential risk areas within their own supply chain
- Each supplier operates a zero-tolerance approach to slavery and human trafficking
- Each supplier does not conduct business knowingly with anyone engaged in slavery and human trafficking practices or knowingly permit them to be carried out in any part of its business

In order to monitor and measure compliance with the above, Avery Healthcare completes due diligence by implementing robust contractual arrangements and applying monitoring procedures as and when appropriate.

Where inappropriate practice is identified, a risk assessment is completed and where required the outcomes reported to senior representatives at Avery Healthcare. Dependant of the severity an audit may be conducted or an embargo placed with immediate effect.

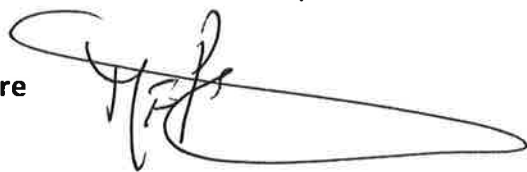
Approval of the statement

This statement was approved by the Board of Directors on **17th April 2019**.

Name (Director)

MATTHEW PROCTOR

Signature



Date

17 April 2019



Care With A Difference

Appendix A

Avery Healthcare Holdings Limited - Subsidiary and Associated Companies

Company Name
Avery Healthcare Group Limited
Avery Opco Lessee Limited
Avery Care Holdco Limited
Willowbrook Healthcare Group Limited
Willowbrook Healthcare Limited
Willowbrook Healthcare Debtco Limited
Willowbrook Healthcare Developments Limited
Avery Homes Rugeley Limited
Avery Homes Cliftonville Limited
Avery Homes Nuthall Limited
Avery Homes Moston Limited
Avery Homes Kirkstall Limited
Avery Homes Newcastle UL Limited
Avery Homes Nuneaton Limited
Avery Homes Wolverhampton Limited
Highcliffe Care Centre Limited
Avery Homes WSM Limited
Avery Homes Hanford Limited
Avery Homes Hatfield Limited
Avery Homes Weybridge Limited
Avery Homes Hinckley Limited
Avery Homes SH Limited
Avery Management Services Limited
Avery Homes Derby Limited
Avery Homes TH Limited
Hawthorns Retirement Living Limited
Avery Homes (Nelson) Limited
Avery Homes RH Limited
Avery (Glenmoor) Limited
Avery (Lucas Court) Limited
Litchfield Care Limited
Avery Homes (Cannock) Limited
Avery Healthcare Limited
Avery Homes Leicester Limited
Avery Healthcare Management Limited



Care With A Difference

Avery Homes Droitwich Limited
Avery Homes (Wimbledon) Limited
Avery Homes Nominee 1 Limited
Avery Homes Nominee 2 Limited
Avery Homes Bristol Limited
Avery Homes Kingstanding Limited
Avery Healthcare Developments Limited
Avery Homes Bracknell Limited
Avery Homes Downend Limited
Avery Homes Clevedon Limited
Avery Homes Stafford Limited
Avery Homes Wellingborough Limited
Avery Holdco Cannock Limited
Avery Homes Stratford Limited
Avery Homes Lichfield Limited
Avery Cannock Opco Limited
Hawthorns Northampton Limited
Avery Homes Grove Park Limited
Avery Holdco Exeter Limited
Willow Domiciliary Care Limited
Adept Build Limited
Avery Homes Kingswood Limited
Avery Homes Edenbridge Limited
Avery Care Devco Limited
Avery Care Clevedon Limited
Avery Care Northants Holdco Limited
Avery Care Northants Limited
Avery Care Kettering Limited
Avery Care (Cannock) Limited
Avery at the Miramar (Operations) Limited
Avery of Leicester (Operations) Limited
Avery at Loxley Park (Operations) Limited
Avery at Loxley Park (Homecare) Limited
Avery Care Leicester Limited
WT UK Opco 1 Limited
WT UK Opco 2 Limited
WT UK Opco 3 Limited