



Home Counties Care Ltd  
We are here to help

At Home Counties Care Ltd, we believe in the importance of equality in the workplace. Being a responsible corporate citizen is not only the right thing to do, it is good for the long term viability of our business. We have an established Employee Code of Conduct which details the standards by which we operate. We are committed to preventing acts of modern slavery and human trafficking from occurring within our business.

We have developed a Code of Conduct which makes it clear that we expect the staff employed, whether permanent or temporary, to have the same basic right to be treated with respect and dignity at work as our own employees. We believe employment should be chosen. There must be no forced, bonded or involuntary prison Labour. Supplier employees must not be required to lodge monies or identity papers in order to work and must be free to leave employment after the giving of reasonable notice.

We are publishing this statement to explain the work we have completed to date to combat modern slavery within our business and the steps we intend to take over the coming year.

Due Diligence Processes for Slavery and Human Trafficking

## Our own Business

As part of our own business we supply temporary personnel to a number of clients. In this respect we have established and audited procedures to ensure that those employees:-

- Have a right to work in the UK. This involves asking the individual direct to view their passport. A delay in providing the passport might indicate a modern slavery issue;
- Where we provide payroll services as required by our own clients, we check that such temporary personnel have a bank account in their own name into which their remuneration is paid; and
- Where we are responsible for such temporary personnel whilst they are employed on our client's premises, they are free to leave their assignment on reasonable notice.

In addition, our employees, through the Employee Code of Conduct, are made aware of requirement for employees to support and uphold human rights principles and know that we will not tolerate, engage in or support the use of, forced Labour.



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## Our Supply Chain

As part of our initiative to identify, monitor and reduce the risk of slavery and human trafficking occurring within our business, we have undertaken the following due diligence procedures:-

- (a) We believe we are in a high risk area, and have written to each such supplier to note our commitment to transparency and combatting modern slavery within our own organisation and our similar expectation from suppliers of goods and services to us. We have sent to these suppliers the Supplier Code of Conduct and requested a signed confirmation from those suppliers that they adhere to our required standards; and
- (b) We have reserved the right with our suppliers to request access to their facilities for members of our Internal Audit Team to check compliance with the Supplier Code of Conduct. Such on-site audits would also help us to identify whether a supplier was engaged in unethical practices, which might include forced Labour or other forms of modern slavery.

We will also follow this process with those further suppliers identified as we complete our supplier mapping work, and with new suppliers. We will include appropriate terms in our agreements which place an obligation on suppliers to comply with the Modern Slavery Act 2015. If we were to find evidence that one of our suppliers has failed to comply with the Modern Slavery Act 2015 then we would require the relevant supplier to remedy such non-compliance and we would consider terminating our relationship should we see no improvement in the way their business is conducted.

This approach is designed to:

- Identify and assess potential risk areas in our UK supply chain;
- Mitigate the risk of slavery and human trafficking occurring in the supply chain;
- Monitor potential risk areas in the supply chain; and
- Provide adequate protection to whistle blowers.

### Risk and Compliance

Corus Consultancy has evaluated the nature and extent of its exposure to the risk of modern slavery occurring through its Internal Audit Function. As our core business is focused on the provision of recruitment services in the driving, industrial, construction and care sector we ensure that we operate an evaluation process every 6 months as we deem that our services are utilised within a high-risk area.



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## Further Steps

Following a review of the effectiveness of the steps we have taken so far this financial year to prevent modern slavery or human trafficking occurring in our business we intend to take the following further steps to combat slavery and human trafficking during the course of the 2023 financial year and beyond:

- Continuing to raise awareness with our key teams provided through training to ensure a high level of understanding of the risks of modern slavery and so they are aware of what to look out for in respect of modern slavery
- Include appropriate anti-modern slavery terms in our agreements with suppliers

