

### **Anti-Slavery Policy**

CRG are proud of the conditions of employment for all our employees throughout the Castlerock Group. Given the nature of our business, our board and management teams each consider that there is minimal risk (approximating to no risk) that, either within the Group or the very limited supply chains which support our business activities, we are in any way involved in or even tangentially supportive of, or complicit in slavery and human trafficking.

The employment and procurement practices operated by the businesses within the Group ensure that the companies within our Group are rightly viewed as excellent and supportive employers. To the extent that our Group companies operate as a purchaser of goods or services we expect a high level of ethical conduct from those businesses with which we do business within our very limited supply chain.

### **Organisation's structure**

The Castlerock Group is incorporated in England with its head office located in St Helens. The companies within the Group are either regulated by the CQC or serve a purpose ancillary to the Group's principal activities of supporting public and private healthcare organisations in providing high quality care by supplying expert, healthcare professionals in both permanent and temporary roles. The Group operates solely in the UK.

### **Our supply chains**

The Group's supply chains are very limited. We do use routine services for example for the maintenance and support of our office operations, including cleaning and technical support services for such things as air conditioning, IT, telephones and communications infrastructure. Additionally we engage with UK hospitals, local authorities and government departments. We do not act as a producer, manufacturer or retailer of physical goods and have no supply chain in relation to such activities.

### **Anti-slavery Policy statement:**

"Castlerock Recruitment Group has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business"

This Anti-Slavery Policy Statement is the principal articulation of the Group's policy on slavery and human trafficking. It is intended to inform and influence all the operational procedures within the Group.

Our stated Anti-Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our business or related supply chains.

### **Due diligence and implementation processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures appropriate to the different companies within the Group. These include the policies and procedures in the following areas:

- Whistleblowing;
- Anti-money laundering, bribery and financial crime.

The Group companies also articulate a series of employee rights and benefits available to

employees in the employee handbooks and individual contracts of employment for each member of staff.

Each of the subsidiary operating companies has an Executive Officer or Director who have reviewed and agreed to the terms of this statement. Each of these executives has reporting responsibilities to management and the various boards of companies within the Group. The Group uses the services of Saffery Champness, City Tower, Piccadilly Plaza, Manchester, M1 4BT as the external auditor and Castlerock receives regular update reports from both the external auditors and its own internal auditor and finance function. A combination of these procedures and functions operates to help identify, assess and monitor potential risk areas and mitigate the risk of slavery and human trafficking occurring in our business and supply chains.

This is the first articulation of a formal Anti-Slavery Policy Statement for the Group. In future we will seek to ensure when entering into material contracts that all those in our supply chain and our contractors comply with our stated Anti-Slavery Policy in particular when seeking tenders for service or when auditing our suppliers.

### **Training**

We will communicate this statement to all our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and in future will include references as part of the Group's training and information materials.

### **Legal and regulatory purpose of this statement:**

This statement is made with regard to the obligations arising under section 54(1) of the UK's Modern Slavery Act 2015 (the Act). Accordingly this statement should be considered to constitute the slavery and human trafficking statement for all companies within the Group for the current financial year and all future financial years until it may in future be modified or amended.