

GGB Healthcare Limited

400 Thames Valley Park Drive, Reading, Berkshire, RG6 1PT

Modern Slavery and Human Trafficking Statement and Policy

Financial year covered: 2026-2027 **Version:** 1.0 **Review:** annually

GGB Healthcare Limited (“GGB”) is committed to preventing slavery, servitude, forced or compulsory labour and human trafficking (together, “modern slavery”) in its own operations and in its supply chains. GGB is below the £36 million turnover threshold at which a statement under Section 54 of the Modern Slavery Act 2015 is mandatory, and is therefore not legally required to publish one. We have nonetheless adopted this statement and policy voluntarily, as a matter of good practice and because we work with vulnerable people and recognise the particular modern slavery risks in the adult social care sector.

1. Organisation, business and supply chains

GGB is a small, newly established provider of home care and community based support operating in Wokingham and the wider Thames Valley. We deliver care directly using our own employed and bank staff and do not subcontract the delivery of care. Our supply chains are short and consist mainly of a small number of suppliers such as our care management software provider, training providers, and suppliers of personal protective equipment and consumables.

2. Our policy commitment

GGB has zero tolerance of modern slavery. We are committed to acting ethically and with integrity in all our business relationships, to treating every worker with dignity and respect, and to ensuring that no one working for us or on our behalf is subject to exploitation. This policy applies to all directors, employees, bank staff, volunteers and anyone acting for or on behalf of GGB. Compliance is mandatory.

3. Due diligence and recruitment controls

Recruitment is the area of greatest risk in our sector, and our controls are focused there. We operate a safer recruitment process which includes:

- Verifying the identity and right to work of every member of staff before employment begins.
- Obtaining enhanced Disclosure and Barring Service (DBS) checks and satisfactory references.
- Ethical recruitment: we never charge workers any fee to obtain or keep work, we never retain workers’ passports or identity documents, and we make only lawful, transparent and agreed deductions from pay.
- Paying all staff at least the National Living Wage and providing written terms of employment.
- Where GGB engages in international recruitment or becomes a licensed visa sponsor in future, complying fully with sponsor duties and the principles of ethical international recruitment, and not passing sponsorship or related costs on to workers.
- Carrying out proportionate due diligence on suppliers and expecting them to uphold equivalent standards; we reserve the right to stop working with any supplier found to be involved in modern slavery.

4. Risk assessment and areas of risk

We assess our modern slavery risk as low overall, given our size and direct delivery model, but we recognise specific risks and manage them actively:

- **Exploitation of care workers**, particularly those recruited from overseas, through recruitment fees, debt bondage, withholding of documents, illegal deductions or excessive hours. We mitigate this through the ethical recruitment controls above.
- **Agency or bank labour**, managed through the same identity, right to work and reference checks as permanent staff.
- **Exploitation among the people we support and in the community**. Our care staff are well placed to notice signs of modern slavery affecting vulnerable adults, and are trained to recognise and report concerns through our safeguarding procedures.

5. Training and awareness

All staff receive awareness of modern slavery as part of their induction and safeguarding training, including how to recognise the indicators of slavery and trafficking and how to report concerns. Managers receive additional guidance on ethical recruitment and supplier due diligence. Responsibility for this policy and for modern slavery matters sits with the Director, Bryana Nweke.

6. Reporting concerns

Anyone with a concern about modern slavery connected to GGB must report it without delay to their line manager or to the Director. Staff may also use our Whistleblowing Policy to raise concerns confidentially and without fear of detriment. Concerns about an individual at risk are also dealt with under our safeguarding procedures. Concerns can additionally be reported to the Modern Slavery and Exploitation Helpline on 08000 121 700, to the Gangmasters and Labour Abuse Authority, or, where someone is in immediate danger, to the police on 999.

7. Monitoring effectiveness

We monitor the effectiveness of this policy through our recruitment and pre employment checking records, supplier due diligence, the completion of staff training, and any concerns raised and how they were resolved. This statement and policy will be reviewed at least annually, approved by the Director, and updated to reflect changes in our business, our supply chains or the law.

8. Approval and sign off

This statement and policy has been approved by the Director of GGB Healthcare Limited.

Signed: Bryana Nweke

Position: Director, GGB Healthcare Limited

Date: 14/06/2026