

Modern Slavery Act: 2026 Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by The ExtraCare Charitable Trust (the Charity) during the year ending 31 March 2026 to prevent modern slavery and human trafficking in its business and supply chains. The statement is reviewed and formally approved by the Board annually.

Introduction

Modern slavery is defined as the recruitment, movement, harbouring or receiving of people using force, coercion, abuse of vulnerability, deception, or other means, for the purpose of exploitation.

Slavery and forced labour (as defined by Article 4 of the Convention on Human Rights) are treated as offences and we recognise, in determining whether 'slavery' or 'forced labour' situations exist, that account must be taken of all the circumstances of the case including the vulnerability of the individual.

Human trafficking is a form of modern slavery and is the movement of people by means such as force, fraud, coercion, or deception, with the aim of exploiting them. Human trafficking does not always involve international transportation, and includes commercial, sexual, and bonded labour.

Criminal exploitation is a lesser-known type of modern slavery and human trafficking that encompasses acquisitive crimes such as forced begging, forced theft (including shoplifting and pickpocketing), as well as cannabis cultivation and financial exploitation.

We are aware that slavery, servitude, forced labour and human trafficking (modern slavery) is a global and growing issue existing in all economies from developing to fully industrialised and in all sectors including food production and processing, construction, hospitality, manufacturing, shipping, and transportation. No sector or industry can be considered immune or untainted and we have a moral, as well as legal, duty to do what we can to ensure that we are not complicit, as far as we can reasonably do so.

We recognise the responsibility to be alert to the risks within our Charity and within our supply chain – our contractors, sub-contractors, other suppliers, and sub-suppliers etc. We have a zero-tolerance approach to modern slavery within the supply chain. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our supply chains or in our business. Colleagues are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.

Our Structure

ExtraCare is a registered charity established in 1988 operating wholly in the UK. We are a not-for-profit charitable Trust and a company limited by guarantee (registered in England under company number 2205136); a registered provider of social housing; and a registered provider of social care providing homes, care services and healthy lifestyles for older people. Our strategy is set by the Board of Trustees, all of whom are independent, non-executive Directors. Operational management is delegated to the Chief Executive supported by three Executive Directors. Our Trust has a wholly owned subsidiary, ExtraCare Retail Limited, which operates 36 charity shops and whose work is overseen by its Board of Directors, including one ExtraCare's Trustee.

Our Vision and Mission



Our vision is 'better lives for older people' and our mission is creating sustainable communities that provide:

- **homes** older people want;
- **lifestyles** they can enjoy; and
- **care** if it's needed.

To deliver our vision and mission we essentially do three things: we **develop** new villages, we **operate** villages and schemes, and we **support** our villages, schemes and our 'extra-care' model through fundraising, advocacy, and research.

Our Charity

We operate 18 retirement communities currently housing 4,319 residents (as at 31st March 2026) living independently in our accommodation. These communities vary in size from 40 to 327 properties. Fourteen locations are fully owned by ExtraCare; the remaining four locations are run in partnership with other housing providers. Our communities are of mixed tenure (available for leasehold, shared ownership, and rental), offering a range of care and support for those who need it, and a vibrant, activity based, healthy lifestyle. Each of our villages and schemes has a range of social, health and leisure facilities that are accessible to our residents, volunteers and local people representing all age groups living in surrounding communities. To support the Charity's vision we operate a subsidiary, ExtraCare Retail Ltd, which donates its profits to the Charity and further income is raised through fundraising. The Operations and Development teams are supported by a range of business support functions including Finance, Procurement, IT and HR. We employ 1,213 people and are supported by 1,762 volunteers (figures at 31st March 2026). The combined annual turnover of the group for the year ending 31 March 2026 is £70.39 million (figures subject to audit).

Our Supply Chain

We are engaged in a wide range of activities including construction, housing and facilities management, delivery of social care, procurement of agency colleagues, catering, cleaning, and retail and therefore have a diverse supply chain with over 450 suppliers. These range from small, local micro enterprises, SMEs (small to medium enterprises), large corporates and PLCs. We currently have no major construction activities underway. Within our supply chain one supplier is based in the Republic of Ireland and a limited number of *ad hoc* purchases from overseas may be made online by procurement card.

Our procurement activity is currently governed by the Procurement Act 2023 and our own internal Financial Regulations and Procurement Policy. At supplier set up and sourcing and selection (as appropriate), bidders of future supplies are asked to confirm their compliance with the Modern Slavery Act 2015. Furthermore, as part of our tender processes, we require suppliers to ensure that subcontractors are aware of and comply with the terms of the contract with ExtraCare's 'Supplier Code of Conduct'. Our Retail subsidiary no longer source goods for resale from China and in 2025/26 sourced all new goods from a small number of reputable UK suppliers.

Our Policies

We have zero tolerance to modern slavery and human trafficking, and we are committed to ensuring that modern slavery legislation is adhered to by our suppliers in accordance with our Supplier Code of Conduct. We are confident that our policies and procedures promote our values and behaviours both amongst colleagues and within our supply base and that these ensure we conduct business in an ethical and transparent manner. Our policies include:

- Procurement – Our procurement procedures include proportionate, risk-based supplier due diligence at sourcing, selection and supplier set-up stage;
- Whistleblowing – this encourages employees, volunteers, and Trustees to raise concerns about how colleagues are being treated, or practices within our business or supply base, without fear of reprisal;
- Safeguarding – this commits us to ensure the principles of safeguarding adults and children are embedded into all aspects of ExtraCare’s practice;
- Human Rights Policy – this provides a framework to ensure all employees, workers, volunteers, and contractors follow the legal obligations set out in the Human Rights Act 1988, The Modern Slavery Act 2015 and the Equality Act 2010;
- Recruitment – we take steps to ensure that all our employees are eligible to work in the UK as part of our own recruitment process for directly employed colleagues. We also carry out right to work and Disclosure and Barring Service (DBS) checks where required; and
- Health and Safety – this policy sets out our approach to ensure we provide a healthy working environment for our colleagues and contractors that work out of our premises.

Our Supplier Due Diligence Processes

Our procurement strategy, policy and supporting documentation ensure that prospective suppliers are subject to a proportionate compliance process, based on the size and risk profile of the supplier. This includes checks on supplier compliance statements, policies, financial standing, insurance, relevant safeguarding requirements and acceptance of ExtraCare’s Supplier Code of Conduct. For higher-risk categories, such as agency labour, facilities management, catering, cleaning, retail goods and overseas or complex supply chains, we may seek further assurance on labour standards, subcontracting arrangements, right to work controls, recruitment practices, and how modern slavery risks are identified, managed and escalated.

Contract terms require suppliers to comply with applicable law, maintain appropriate controls in their own operations and supply chains, notify ExtraCare of any actual or suspected modern slavery concern, and cooperate with any reasonable review, audit or remedial action.

All suppliers are required to confirm compliance with the Modern Slavery Act and our due diligence processes are designed to:

- Identify and assess potential risk areas in our supply base;
- Mitigate the risk of slavery and human trafficking occurring in our supply base; and
- Protect whistleblowers.

Our Training

We provide mandatory safeguarding training to all colleagues and volunteers which includes modern slavery. By completing this training, employees are able to gain a wider knowledge of modern slavery and human trafficking and recognise potential areas of risk within the workplace.

Grievances or Complaints Received During the Year

There were no grievances or complaints related to modern slavery or human trafficking received.

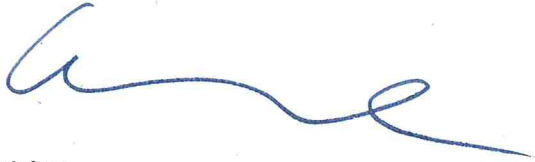
Future Steps

We have several actions to progress in terms of procurement/contracting which will provide further assurance on our Modern Slavery Act compliance:

- Our dedicated Category Managers will monitor our agency staffing suppliers to provide a more robust compliant review;
- We will review our current codes of conduct for colleagues, volunteers, Trustees and Suppliers to meet regulatory standards and provide a framework for our expected values, standards and behaviour; and

- We will introduce a mandatory Modern Slavery eLearning module for all colleagues involved in contracting, procurement and recruitment.

We understand that modern slavery risk is not static, and we will aim to align our policies and procedures on modern slavery and human trafficking with best practices and changes in legislation.



Nick Towe
Chair of Trustees
For and on behalf of the ExtraCare Charitable Trust