



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Introduction

Celsus Group Limited (the “Company”), consisting of Locum Staffing Limited, Medical Staffing Limited, Key Medical Services Limited, Celsus Managed Services Limited, TNA Medical Limited, Celsus Consulting & Training Limited, Medical Staffing Primary Care Limited and all other Group companies, recognises that modern slavery and human trafficking is a violation of fundamental human rights and is contrary to the Modern Slavery Act 2015 (the “Act”). We have a zero tolerance approach to all forms of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place.

This Modern Slavery and Human Trafficking Statement sets down Celsus Groups commitment to preventing slavery and human trafficking in our business activities and the steps we have taken and will be taking to put in place with the aim of ensuring there is no slavery or human trafficking in our business and in our interactions with clients and our supply chains. We all have a duty to be alert to risks, however small. Employees are expected to report their concerns and management to act upon them.

Structure and supply chains

This statement covers the business activities of Celsus Group which are as follows:

- Recruitment of permanent and temporary staff in the Primary and Acute Healthcare field.
- Provision of Medical Services.
- Provision of Managed Service offerings in the Healthcare field.
- Provision of Consulting and Training in the Healthcare field.

The Company operates in the United Kingdom but also has supplies of services across India and South Africa.

Celsus Group use a rigorous onboarding process for its employees and its candidates which includes comprehensive eligibility to work checks and a thorough compliance process.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, Celsus Group includes information and briefings as part of the onboarding

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process. The Company is working towards ensuring that all client agreements cover risks of modern slavery and human trafficking.

Policies on Modern Slavery

Celsus Group is committed to ensuring that there is no modern slavery or human trafficking in our business, in our supply chains and in the business of our clients. This Statement affirms our intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in our operations

1. **Recruitment** – We operate a thorough recruitment process for all staff working for the Group which includes collecting adequate references, undertaking self-declarations outlining criminal convictions and conducting eligibility to work checks to safeguard against human trafficking or individuals being forced to work against their will
2. **Compliance** – We operate a dedicated compliance team to monitor 100% of our workforce, internally and on assignment, checking:
 - a. Bank Account – workers must have proof of own/joint bank account
 - b. Phone numbers – workers must be contacted on their own mobile phones
 - c. Addresses – high numbers of workers not living at the same address
 - d. NI # - workers must provide details of their national insurance number and no duplicated
 - e. Interviews and ID checks – to check the identity of the worker

Workers operating under Umbrella Companies undertake the same checks with each Umbrella Company also being verified through our Umbrella “Fit to operate” scheme.

3. **Whistleblowing policy** – We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues and candidates are being treated, or practices within our business or clients/supply chain, without fear of reprisals.
4. **Ethics policy** – Celsus Group is committed to the practice of responsible behaviour. Through its business practices the Company seeks to protect and promote the human rights and basic freedoms of all its employees and candidates.

Due Diligence Processes for Modern Slavery and Human Trafficking

Celsus Group undertakes due diligence when considering taking on new suppliers or new Umbrella companies. Existing suppliers of services are regularly reviewed.

The Company is working on improving the robustness of its communication to suppliers with regards to its stance on Modern Slavery and Human Trafficking including the introduction of requesting modern slavery and human trafficking policies/statements from major suppliers. We have had no instances or concerns with regards to Modern Slavery or Human Trafficking from our suppliers to date.

Celsus Group operates a small number of preferred suppliers on which we conduct due diligence across a number of business criteria and from 2019 includes a specific request on Modern Slavery and Human Trafficking.

From 2019, we will also be introducing anti-slavery and human trafficking statements into all of our candidate and client contracts.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Senior Management and Shareholders endorse this policy statement and are fully committed to its implementation.

The financial year for Celsus Group and its Group companies is 31st December 2018 and this statement covers this period.

This Modern Slavery and Human Trafficking Statement was approved and authorised at the Board Meeting held on 21st May 2019.

Name: Rakesh Thakrar, Shareholder and Director

Date: 1st June 2019

Signature: 

Name: Milan Thakrar, Shareholder and Director

Date: 1st June 2019

Signature: 