

Modern Slavery and Human Trafficking Statement 2025/26

Financial Year Ended 30th June 2026

1. Introduction

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by Hunter Healthcare Resourcing Limited during the financial year ended 30 June 2026 to prevent slavery and human trafficking within its business and supply chains.

This statement incorporates our modern slavery policies and procedures, alongside our annual Transparency in Supply Chains (TISC) Statement, which is included as Appendix 1.

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

- **Slavery:** Exercising powers of ownership over a person.
- **Servitude:** The obligation to provide services is imposed by the use of coercion.
- **Forced or compulsory labour:** Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
- **Human trafficking:** Arranging or facilitating the travel of another person with a view to their exploitation.

1.2 This statement covers all four activities.

2. Relevance to Us

2.1 Slavery is a complex and multi-faceted crime, and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it is not.

2.2 At a considerably basic level, preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.

2.3 The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

2.4 With this in mind, we need to pay particularly close attention to:

- Our clients and candidates.
- Our suppliers.
- Any outsourced activities, particularly to jurisdictions that may not have adequate safeguards.
- Cleaning staff.
- Corporate hospitality.



3. Our Organisation, Business and Supply Chains

Our structure

This statement is made by Hunter Healthcare Resourcing Limited (company number 07600695), a private limited company incorporated in England and Wales in 2011, with its registered office in London. We are a subsidiary of Nimrod Bidco Limited (company number 13571751), a private limited company registered in England and Wales. The business is overseen by its Board of Directors.

We employ approximately 127 staff. Our head office is in London, and we operate from co-working spaces in Leeds and Bristol. We also have offices in Boston and New York, USA, which are operated by Hunter Healthcare Resourcing LLC. Although we form part of a wider corporate group, this statement applies to Hunter Healthcare Resourcing Limited only.

Our business

We provide recruitment and staffing services to NHS organisations, other public sector bodies and private healthcare providers. These include executive and permanent recruitment and temporary and interim staffing. We also provide people advisory and consultancy services within the healthcare sector.

Our labour supply chain

As a recruitment business, the people we place with clients are central to our supply chain. We source candidates directly through our own consultants, job advertising and referrals, and, where needed, through approved third-party recruitment agencies. Candidates are recruited mainly from within the UK. We do not charge candidates fees for finding them work.

Our wider supply chain

We also use third-party suppliers for technology, professional services, office facilities (including cleaning/facilities management) and other services supporting our business. Most of our suppliers are based in the UK.

4. Responsibilities

4.1 Everyone at Hunter Healthcare Resourcing Limited, from our directors to our employees, have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

4.2 Everyone must comply with the standards and procedures set out in this statement. Ignoring concerns about modern slavery or exploitation is unacceptable.

4.3 We will:

- Maintain clear policies and procedures preventing exploitation and human trafficking and protecting our workforce and reputation.
- Be clear about our recruitment procedures (see Section 6.3).
- Check our suppliers (see Section 6.2).



- Check our clients and candidates in line with our recruitment and compliance procedures (see Section 6.3).
- Lead by example by making appropriate checks on all employees, suppliers, clients, and candidates to ensure we know who we are working with.
- Ensure we have in place an open and transparent grievance process for all employees.
- Seek to raise awareness so that our employees know what we are doing to promote their welfare.
- Make a clear statement in Section 6.1 below that we take our responsibilities to our employees, suppliers, clients and candidates seriously.
- Commit to escalating and investigating any credible reports or suspicions of modern slavery promptly and in accordance with our reporting procedures.

4.4 Directors will:

- Listen and be approachable to employees.
- Respond appropriately if they are told something that might indicate an employee is in an exploitative situation.
- Remain alert to indicators of slavery (see Identifying Slavery).
- Raise the awareness of our employees, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do.
- Use their experience and professional judgement to gauge situations.

4.5 Employees at any role or level of seniority must:

- Keep their eyes and ears open—if they suspect someone (a colleague, a candidate or someone in our supply chain) is being controlled or forced by someone else to work or provide services, they must report it.
- Follow our reporting procedure set out in paragraph 8 below if a colleague tells them something they think might indicate they are or someone else is being exploited or ill-treated.
- Tell us if they think there is more we can do to prevent people from being exploited.

5. Risks

5.1 The principal areas of risk we face, related to slavery and human trafficking, include:

- Engaging employees.
- Recruiting candidates for clients.
- Engaging with suppliers or subcontractors in jurisdictions with weak labour protections.
- Outsourcing activities, particularly where visibility or control is limited.

5.2 We manage these risk areas through the procedures described in this statement.



6. Procedures

6.1 Our Commitment to Preventing Modern Slavery

6.1.1 We make a clear statement that we take our responsibilities to our employees, people working within our supply chain, our candidates, and our clients seriously.

6.1.2 The following sections describe our policies, procedures and ongoing commitments to preventing modern slavery and human trafficking. Our annual Transparency in Supply Chains Statement, included as Appendix 1, provides further information on the steps taken during the financial year ended 30 June 2026.

6.1.3 Our Statement: We are a recruitment agency, and therefore at the heart of employment relationships. We acknowledge our responsibility to ensure, to the best of our abilities, that no candidate is subject to slavery or trafficking.

6.2 Supply Chains

6.2.1 We thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.

6.2.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation.

6.2.3 All supplier contracts include an anti-slavery clause requiring compliance with the Modern Slavery Act and Hunter Healthcare's ethical standards.

6.2.4 We ensure we can account for each step of our supply processes—we know who is providing goods and services to us and we have mechanisms and processes in place to check.

6.2.5 We conduct periodic reviews of our key suppliers and request updated compliance declarations annually. Where concerns are identified, we take appropriate remedial action, which may include terminating the relationship.

6.3 Recruitment

6.3.1 Providing our services to clients and candidates:

- Our recruitment team follows firm policy and only uses agreed specified reputable recruitment agencies.
- To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:
 - Conducting background checks.
 - Investigating reputation.
 - Ensuring the staff it provides have the appropriate paperwork (e.g., work visas).
- We keep agents on the list under regular review, at least every 1 year.



6.3.2 Internal recruitment:

- We always ensure all employees have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- We always ensure employees are legally able to work in the UK.
- We check the names and addresses of our employees (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- We provide information to all new employees on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

6.4 If, through our recruitment process, we suspect someone is being exploited, the employee will follow our reporting procedures (See Reporting Slavery).

7. Identifying Slavery

7.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

7.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification, or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn, or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

7.3 This list is not exhaustive.

7.4 Remember, a person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not right.

7.5 If you have a suspicion, report it.

8. Reporting Slavery

8.1 Talking to someone about your concerns may stop someone else from being exploited or abused.

8.2 If you think that someone is in immediate danger, dial 999.



8.3 Otherwise, you should discuss your concerns with one of our Directors who will decide a course of action and provide any further advice.

8.4 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with a director before taking any further action.

8.5 All reported concerns are recorded, reviewed by a Director, and handled with discretion. Where required, we will report to the appropriate authorities or the Modern Slavery Helpline.

9. Training

We provide training to all of our staff members who participate in managing recruitment, clients, candidates, and our supply chains. This includes mandatory annual training covering how to recognise signs of modern slavery, understand reporting channels, and uphold our obligations under the Modern Slavery Act. Training completion is monitored centrally.

10. Monitoring and Measuring Effectiveness

We review our modern slavery policies and procedures annually to assess their effectiveness and identify opportunities for improvement.

To support this review, we will monitor relevant performance indicators, including:

- **Training:** The number and percentage of relevant employees who have completed mandatory modern slavery training.
- **Supplier due diligence:** The number of supplier compliance checks and reviews undertaken, including any concerns identified and subsequent actions taken.
- **Reporting and investigations:** The number of modern slavery concerns reported, investigations undertaken and outcomes recorded.
- **Corrective actions:** The number of identified compliance issues and the proportion of resulting corrective actions completed.

The information collected will be considered as part of our annual review to identify emerging risks, assess the effectiveness of existing controls and determine whether further action or improvements are required.

Where monitoring identifies gaps in our procedures, we will consider appropriate corrective measures and review their implementation.

11. Transparency in Supply Chains (TISC) Statement

Our annual Transparency in Supply Chains Statement is included as Appendix 1 of this document.



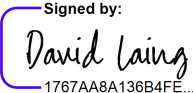
The TISC Statement provides further information on our organisational structure, supply chains, modern slavery risks, due diligence procedures, training and the measures taken to assess effectiveness during the financial year ended 30 June 2026.

The combined statement is subject to review and approval by the Board of Directors and is published in accordance with Section 54 of the Modern Slavery Act 2015.

Statement of Approval

This Modern Slavery and Human Trafficking Statement, including Appendix 1, has been approved by the Board of Directors of Hunter Healthcare Resourcing Limited.

Board approval date: 16 October 2026

Signed:  Signed by:
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Name: David Laing

Position: CFO

Date: 16 October 2026

