

AG EUNICE CARE

Modern Slavery & Human Trafficking Statement

Nurturenest Family Care and Coaching Ltd
trading as Ag Eunice Care

PUBLIC-SECTOR PROCUREMENT & GOVERNANCE STATEMENT

Organisation	Nurturenest Family Care and Coaching Ltd (trading as Ag Eunice Care)
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Voluntary statement maintained as part of our ethical recruitment, supply-chain and public procurement governance framework.

Document Control

Version	Date	Change	Approved by
1.0	21 July 2026	Initial issue	Director
2.0	03 August 2026	Expanded procurement-ready statement; added Section 54 status, effectiveness measures, supply-chain safeguards, training controls and appendices	Managing Director

Approval

Approved by: Eunice Ndu, Managing Director

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Next scheduled review: 03 August 2027

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1. Statement of Commitment

Nurturenest Family Care and Coaching Ltd, trading as Ag Eunice Care, has zero tolerance for modern slavery, human trafficking, forced labour, servitude, debt bondage, child labour and other forms of labour exploitation. We are committed to conducting business ethically, transparently and with integrity, and to taking proportionate steps to prevent exploitation in our operations and supply chains.

This statement applies to our UK operations and is intended to provide clear evidence of our governance approach for clients, workers, candidates, suppliers, business partners and public-sector contracting authorities.

2. Section 54 Status and Legal Context

Nurturenest Family Care and Coaching Ltd is not currently a “relevant commercial organisation” for the purposes of section 54 of the Modern Slavery Act 2015 because its annual turnover is below the statutory £36 million threshold. We nevertheless maintain this statement voluntarily as part of our commitment to ethical recruitment, responsible supply-chain management and public-sector procurement readiness.

Our approach is informed by applicable UK legal and regulatory requirements, including, where relevant:

- Modern Slavery Act 2015;
- Employment Agencies Act 1973 and the Conduct of Employment Agencies and Employment Businesses Regulations 2003;
- Immigration, Asylum and Nationality Act 2006 and applicable right-to-work requirements;
- Equality Act 2010;
- Data Protection Act 2018 and UK GDPR; and
- contractual and ethical recruitment requirements imposed by public-sector customers.

Nothing in this voluntary statement is intended to imply that the organisation is subject to a statutory section 54 publication duty where that duty does not apply.

3. About Our Organisation

Nurturenest Family Care and Coaching Ltd is the legal entity through which Ag Eunice Care operates. Ag Eunice Care is positioned to provide recruitment, staffing, workforce support and related workforce solutions. Our operating model is designed around ethical recruitment, proportionate due diligence, clear accountability, secure information handling and transparent relationships with candidates, workers, customers and suppliers.

As the business develops its UK trading activity, governance and compliance controls are being embedded before and alongside service delivery. We do not present planned or developing controls as completed evidence where they have not yet been implemented; records will be retained to evidence implementation as activity commences.

4. Our Supply Chain

Our supply chain is proportionate to our current operations and may include technology providers, training providers, professional advisers and other business-service suppliers. Where recruitment partners, contractors, subcontractors or other third parties are used in future, they will be subject to appropriate due diligence, contractual controls and ongoing monitoring.

We expect suppliers and business partners to uphold ethical labour practices, comply with applicable modern slavery and human trafficking legislation, cooperate with due diligence requests and promptly report concerns. We will not knowingly engage a supplier or business partner where credible evidence of forced labour, trafficking or serious labour exploitation is identified and is not appropriately addressed.

5. Modern Slavery Risk Assessment

We recognise that modern slavery risk can arise at different points in recruitment, labour supply and supporting supply chains. Our principal risk areas include:

- international recruitment and cross-border worker movement;
- temporary and contingent labour;
- use of recruitment intermediaries or labour suppliers;
- worker-paid recruitment fees, debt bondage or coercive financial arrangements;
- identity, qualification or right-to-work fraud;
- withholding of identity documents or restrictions on freedom of movement;
- unexplained deductions, underpayment or non-payment of wages;
- high-pressure, deceptive or coercive recruitment practices;
- suppliers operating in higher-risk sectors or geographies; and
- limited visibility beyond first-tier suppliers.

Higher-risk activities will receive enhanced due diligence and, where appropriate, management approval before engagement.

6. Recruitment and Worker Protection Principles

- Recruitment will be fair, transparent and based on genuine role requirements.
- Candidates and workers will not knowingly be charged unlawful work-finding or recruitment fees.
- Identity and right-to-work checks will be completed in accordance with applicable legal requirements.
- Employment history, references, qualifications and professional registrations will be verified where relevant to the role and customer requirement.
- DBS or other criminal-record checks will only be undertaken where lawful and appropriate to the role.
- Candidates will receive accurate information about the role, customer, pay or salary expectations and material terms known to us.
- We will not knowingly retain passports or original identity documents beyond what is reasonably necessary for lawful verification.
- Any suspected coercion, trafficking, exploitation or fraudulent recruitment practice will be escalated promptly.

7. Due Diligence

Our due diligence approach is proportionate to the nature and risk of the relationship. Depending on the circumstances, checks may include:

- verifying supplier or partner identity and business registration;
- reviewing ownership, contact details and trading legitimacy;
- reviewing recruitment and right-to-work practices where relevant;
- checking required insurance and professional credentials;
- reviewing modern slavery, ethical recruitment and safeguarding controls;
- obtaining contractual commitments to comply with applicable laws and ethical labour standards;
- assessing higher-risk geographies, labour models or supply chains;
- recording due diligence outcomes, actions and approval decisions; and
- reassessing suppliers when risk, ownership, service scope or concerns materially change.

8. Supplier and Subcontractor Expectations

Where a supplier, recruitment partner or subcontractor is used, we expect it to:

- comply with applicable modern slavery, employment and recruitment legislation;
- prohibit forced labour, trafficking, debt bondage and child labour;
- maintain accurate worker and recruitment records;

- cooperate with audits, evidence requests and investigations where proportionate;
- notify us promptly of suspected exploitation or material compliance concerns;
- take corrective action within agreed timescales; and
- flow relevant ethical labour requirements into its own supply chain where appropriate.

Serious or unresolved non-compliance may result in suspension, remediation requirements or termination of the relationship, subject to applicable contractual and legal obligations.

9. Training and Awareness

Relevant personnel will receive appropriate modern slavery, ethical recruitment and safeguarding awareness before undertaking relevant recruitment, supplier-management or compliance responsibilities. Refresher awareness will be provided periodically and when material legal, contractual or risk changes occur.

Training and awareness will be proportionate to role and may cover:

- common indicators of modern slavery and labour exploitation;
- ethical recruitment and candidate treatment;
- right-to-work and identity-check risks;
- how to respond to disclosures or suspicious behaviour;
- internal escalation and whistleblowing routes;
- record keeping and confidentiality; and
- when concerns should be referred to appropriate external authorities.

10. Reporting Concerns and Whistleblowing

Suspected modern slavery, trafficking or labour exploitation should be reported promptly through management, the safeguarding/escalation route or the organisation's Whistleblowing Policy. Reports will be handled sensitively, recorded appropriately and escalated according to the level of risk.

Where there is an immediate risk to life or safety, emergency services should be contacted. Where a concern may involve criminal activity or regulatory breach, the organisation will consider referral to the appropriate competent authority. No person should suffer retaliation for raising a genuine concern in good faith.

11. Monitoring, Effectiveness and Continuous Improvement

We will assess the effectiveness of this statement through proportionate management information and evidence. As operations commence and grow, management will review trends, incidents and control performance and will strengthen controls where necessary.

Performance indicators may include:

- percentage of relevant suppliers completing due diligence before approval;
- percentage of required identity and right-to-work checks completed before deployment or placement;
- percentage of relevant personnel completing required modern slavery / ethical recruitment awareness;
- number and type of modern slavery, safeguarding or labour-exploitation concerns raised;
- number of supplier non-conformities and corrective actions;
- complaints or whistleblowing reports relevant to labour exploitation;
- timeliness of investigation, escalation and closure of corrective actions; and
- annual review of risk assessment and this statement.

Where there is insufficient activity to produce meaningful numerical metrics, the organisation will record a narrative review rather than create artificial or misleading statistics.

12. Responsibilities and Governance

Role	Responsibility
Managing Director	Overall accountability; approval of this statement; escalation of material risks; approval of high-risk suppliers or remediation actions.
Managers / Recruiters	Apply recruitment and due diligence controls, maintain records, identify red flags and escalate concerns.
Compliance / Safeguarding responsibilities	Support investigation, risk assessment, record keeping and referral where appropriate.
Workers and personnel	Follow relevant policies, complete required awareness, report suspected exploitation and cooperate with investigations.
Suppliers / partners	Meet contractual ethical labour requirements and notify the organisation of material concerns.

13. Related Policies and Controls

This statement should be read alongside the organisation's wider governance documents, including where applicable:

- Safeguarding Policy and Procedures;
- Safer Recruitment and Vetting Policy;
- Whistleblowing Policy;
- Equality, Diversity and Inclusion Policy;
- GDPR / Data Protection Policy;
- Health and Safety Policy;
- Complaints Policy;
- Supplier / Subcontractor Due Diligence arrangements;
- Environmental Policy;
- Quality Policy; and
- Business Continuity Plan.

14. Review and Publication

This statement will be reviewed at least annually and sooner where there is a material change in law, business model, supply chain, risk profile, customer requirement or following a significant incident. The current approved version may be published on the organisation's website and provided to public-sector customers or procurement authorities on request.

15. Approval

This Modern Slavery & Human Trafficking Statement has been approved by the Managing Director on behalf of Nurturenest Family Care and Coaching Ltd (trading as Ag Eunice Care).

Name	Eunice Ndu
Role	Managing Director
Signature	_____
Date	03 August 2026

Appendix A - Modern Slavery Risk Assessment

Risk area	Initial risk	Key controls	Residual risk	Further action / owner	Review date
International recruitment	Medium	Ethical recruitment checks; role transparency; right-to-work and identity verification; escalation of fee/coercion concerns	Low-Med	Review when international activity begins	At least annual
Temporary / contingent labour	Medium	Worker checks; clear pay/terms information; complaint and safeguarding routes; customer requirements	Low-Med	Monitor placement-related concerns	At least annual
Recruitment intermediaries	Medium-High	Supplier due diligence; legal/ethical commitments; evidence requests; monitoring	Medium	Enhanced due diligence for high-risk partners	Before engagement / annual
Identity / right-to-work fraud	Medium	Document/online right-to-work checks as applicable; identity verification; record keeping	Low-Med	Refresher training when rules change	Ongoing
Worker-paid fees / debt bondage	Medium	No unlawful candidate work-finding fees; recruitment transparency; escalation and remediation	Low	Monitor complaints and candidate feedback	Ongoing
Lower-tier supply chain visibility	Medium	Contractual flow-down; supplier declarations; risk-based review	Low-Med	Increase monitoring where supply chain expands	Annual

Appendix B - Supplier Due Diligence Checklist

Company identity and registration verified

Ownership / responsible contact confirmed

Relevant insurance verified where required

Modern slavery / ethical recruitment controls reviewed

Right-to-work and recruitment practices reviewed where relevant

Safeguarding / complaints / whistleblowing arrangements considered where relevant

Data protection and confidentiality requirements considered

Contractual ethical labour commitment obtained

Risk assessment completed

Approval decision and review date recorded

Reference number	
Date/time	
Reporter / contact	
Description of concern	
People / organisations involved	
Immediate safety actions	
Escalation / external referral	
Investigation / corrective action	
Outcome / closure date	

Appendix D - Effectiveness / KPI Review Record

Measure	Period	Result / narrative	Action required	Owner / due date

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