

Modern Slavery and Human Trafficking Statement Financial Year 2025/2026

Achieve together is one of the UK's leading providers of support for people with learning disabilities, autism, PMLD, deafness, hearing loss and associated complex needs. Our organisation has over 30 years of expertise and our ethos has always been to have people we support and their families at the heart of our organisation and at the centre of everything we do. Together we are focused on providing a strong foundation to offer the best possible support.

Our team of expert practitioners are proud to deliver high-quality support to over 2,300 people in over 400 care homes and services across England and Wales. We endeavour to be a continuing leader in best practice across the country and ensure that people we support have every opportunity to fulfil their potential. Our goal is to drive quality across the sector and lead by example.

The purpose of this statement is to set out our commitment to, the steps already taken, and steps we will continue to take, to mitigate the risk of modern slavery or human trafficking taking place within our organisation or supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") in respect of the financial year ended 28 February 2026.

Achieve together has zero tolerance to slavery and human trafficking across its entire business operations. We are also committed to the prevention of slavery and human trafficking, in all its forms. We will not tolerate or condone it within any part of our organisation or supply chain. This statement sets out our commitment to ensuring a non-discriminatory and respectful working environment for all our team members (whether permanent or temporary), consultants and consultants (whether working directly for Achieve together or for our third-party suppliers (so far as possible) and sets out our associated policies for our supply chain.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Organisational structure and supply chains

This policy applies to Galaxy Group Bidco Limited and all its subsidiaries, including Achieve together Limited which is the principal trading entity of the Group. Achieve together have appropriate governance in place to effectively support this statement.

Our supply chain is primarily UK-based and supports the delivery of care services across our estate of over 400 properties. From a procurement and property portfolio perspective, key areas of supplier engagement include but not limited to:

- Agency staffing and recruitment providers
- Property maintenance and facilities management contractors
- Capital projects and construction suppliers
- Supply of consumable items and furniture
- Utilities, waste management, and environmental services
- COSHH, medical, and operational consumables

Responsibility for managing supply chain risk sits with our Procurement and Estates functions, with oversight from senior leadership and sponsorship at Executive Board level.

We recognise that certain areas of our supply chain present a higher potential risk of modern slavery, particularly:

- Labour-intensive services such as cleaning, maintenance, and construction
- Agency and temporary staffing
- Subcontracted works within estates and capital projects
- Consumable items purchased which could have been manufactured outside of the UK

Procurement Controls and Due Diligence

We have implemented controls within our procurement and estates processes to mitigate these risks, including:

- **Supplier onboarding checks** to assess suitability, including ethical standards and compliance with the Modern Slavery Act
- **Standard contractual clauses** requiring suppliers to comply with our standard terms of business including modern slavery legislation and maintain their own policies where applicable
- **Risk-based supplier segmentation**, focusing enhanced scrutiny on higher-risk categories such as estates contractors and labour providers
- **Use of approved supplier lists**, limiting engagement to vetted and onboarded suppliers only
- **Supplier performance monitoring**, including periodic reviews and audits where appropriate
- **Consumable Goods**, In instances where consumable goods are procured from suppliers that source outside the UK, we undertake risk-based due diligence to ensure suppliers adhere to applicable modern slavery legislation and demonstrate appropriate ethical and labour practices.

Within Estates and Capital Projects, we also:

- Require principal contractors to take responsibility for their subcontractor compliance however we ensure full visibility and confirmation of compliance.
- Expect visibility of labour practices across project delivery
- Incorporate compliance expectations into any tenders and contract documentation at point of engagement.

Although we assess our overall exposure to be relatively low, we adopt a proactive and continuous improvement approach by:

- Periodically reviewing supply chain risks as part of procurement governance
- Working with suppliers to improve transparency where needed
- Providing clear escalation routes for any concerns identified
- Aligning estates and procurement activity with safeguarding principles across the organisation

Policies and Procedures

We have the following policies and associated processes to ensure they include reference to the duties of the organisation and individual team members and, where applicable, information on the Modern Slavery Act.

These policies include:

Policy	Functional Owner
Modern Slavery Policy	Quality
Speak Up	Quality
Anti -Bullying and Harassment	People
Whistleblowing	Quality
Safeguarding Adults	Quality
Equity, Diversity and Inclusion	People
Recruitment and Selection	People
Agency Team Members	People
Employee Wellbeing	People

Embedding our principles

We will continue to embed the principles of this statement and associated policies.

We will also undertake an annual review of this statement with the Senior Leadership Team in line with our annual financial reporting timetable.

Approved by the Board of Galaxy Group Bidco Limited on 25 June 2026.

Director's signature: 

Director's name: Chris Saunders