

39. MODERN SLAVERY POLICY (anti-slavery)

Aims of this policy

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, agency workers, contractors, consultants and any other third party representative.

We expect all who have, or seek a business relationship with the company to familiarise themselves with this policy and to act always in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy or those who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

What do we mean by modern slavery?

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to:

Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development].

All forms of modern slavery have in common the deprivation of a person's liberty by another to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

How we seek to embed our anti-slavery policy in practice

- Our Service Level Agreement for Suppliers and Contractors contains a specific statement prohibiting slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour in line with this policy. We also make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.
- We have ascertained that our biggest risk in terms of outsourced activities (considering recent research on the construction industry) relates to contractors employed to work at our developments across the country. As such, we have introduced a Toolbox Talk on Modern Slavery to add to our suite of Toolbox Talks which are administered by Site/Estate Managers to site staff. This includes useful information on spotting the signs of modern slavery and labour exploitation such as restricted freedom; behaviour; working conditions; accommodation; finances and appearance.

Responsibility for this Policy

The Executive Leadership Team has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The Business Improvement Manager will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

Communication and employee awareness training

The Business Improvement Manager will ensure that all relevant staff receive adequate training on this policy and any supporting processes applicable to their role. Such training forms part of the Company's induction processes as well as Toolbox Talks.

Breaches of this policy

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate fully in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the Business Improvement Manager.

Status of this policy

This Anti-slavery policy will be reviewed by the Executive Leadership Team on a regular basis.

This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.