

Modern Slavery Statement for Financial Year 2023/24



Latest revision January 2024

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 ("the Act") and sets out the steps that Anwyl Group has taken and is continuing to take to ensure that Modern Slavery or Human trafficking is not taking place within our business or supply chain.

A review of our Modern Slavery and Human Trafficking statement was undertaken during the course of the year.

Our Business

Anwyl Group remains a family-owned business and has been established for over 90 years. Anwyl Group Ltd is the holding group company of Anwyl Construction Company Ltd, which operates in two divisions: Anwyl Homes and Anwyl Partnerships. T. Anwyl & Son Ltd and Anwyl Land Ltd are also part of the Anwyl Group.

Anwyl Homes delivers new build homes across two regions: Cheshire & North Wales, and Lancashire. Anwyl Partnerships delivers contracts for public sector clients. Anwyl Land provides services to procure and develop land across the UK. We maintain an organisation governance structure comprising of a Group Board who remain accountable for this statement, with delegated authority to the Senior Leadership Team who approve processes and procedures outlined in this statement are performed and assured.

We employ approximately 250 colleagues who perform a range of office and site based activities. We pay a minimum of the National Living Wage for all eligible colleagues and comply with all applicable employment law obligations.

Our Supply Chains

We procure a wide range of goods and services through a diverse supply chain which includes:

- Main Contractors;
- Sub-contractors who provide materials, labour and plant;
- Manufacturers and Suppliers who deliver direct to site or to the subcontractor;
- Utility companies; and
- Professional and specialist consultants.

We have a stable supply chain which allows us to benefit from a significant number of long-term trading relationships with Subcontractors, Suppliers and Consultants who share our values and ethics.

A number of our suppliers will in their own right meet the turnover threshold which triggers a requirement to comply with the obligation to produce a Slavery and Human Trafficking Statement under the Act. In any event we actively encourage all our suppliers to ensure that they comply with not only the content, but also the spirit and intent of the Act.

Due Diligence

Following the publication of the Act, we have strengthened our approach to ethical and responsible sourcing through a number of key initiatives.

All Suppliers and Subcontractors must submit a detailed pre-qualification questionnaire prior to being considered for working in partnership with Anwyl Group. The questionnaires also take into consideration the country of manufacture which allows us to identify materials supplied by manufacturers with a higher risk profile.

Where required by the Act, our supply partners must confirm that they have implemented and follow their own Modern Slavery Policy.

Our Standard Purchase Order and Subcontractor Terms of Contract require trading partners to comply fully with the Act, with any breach resulting in the termination of all live contracts.

The steps we have taken will help to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Protect whistleblowers.

Our Policies and Procedures

Our internal policies and procedures ensure we conduct our business in an ethical and transparent manner. These include:

Recruitment

We operate a robust recruitment process, including conducting right to work in the UK checks for all colleagues to safeguard against Modern Slavery and Human Trafficking. We have digitised our recruitment process to further enhance the process, data processing and storage of information.

Supplier and Contractor Control Procedure

This details the process and due diligence applied when authorising and monitoring the supply chain and associated practices and is reviewed regularly.

Grievance and Whistleblowing

We have processes in place so all employees know that they can raise concerns about how colleagues are being treated, or practices in our business or supply chain without fear of reprisal. Our Colleague handbook explains the way we behave as an organisation and how we expect our employees to act.

Colleague Training

We provide training for all our colleagues annually to ensure they understand the importance of the topic and what to do if they suspect signs of Modern Slavery or Human Trafficking.

Our Suppliers

Anwyl Group operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers. This due diligence includes an online search to ensure that organisation has never been convicted of offences relating to modern slavery, along with on-site audits which include a review of working conditions. We have a zero-tolerance policy towards slavery and human trafficking. Ensuring our suppliers and contractors conform to the Modern Slavery Act 2015 forms part of our contract with suppliers and they are required to confirm that no part of their business contradicts this statement.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- they have taken steps to ensure Modern Slavery does not occur in their business;
- they hold their own suppliers to account over Modern Slavery;
- they make sure they complete all the right to work documentation for new starters;
- they make sure employees know their statutory rights including sick pay / holiday pay; and
- we may terminate the contract at any time should any instances of Modern Slavery come to light.

Further Steps

We will continually monitor the effectiveness of the steps we are taking to ensure the Modern Slavery and Human Trafficking are not taking place within our business or our supply chain. All members of our staff understand the importance of this subject and know both how to report any suspected incident and the way we deal with any suspected incidents. If reports are received from colleagues, the public, or law enforcement agencies, we will ensure that they are fully investigated and processed accordingly.

In the last 12 months the group can report the following:

- we have carried out a risk assessment of our direct and indirect supply chain to identify areas of vulnerability.
- training has been provided to colleagues to provide them with the necessary tools to identify Modern Slavery or Human Trafficking within our business and our supply chain.
- we have had no suspected incidents of Modern Slavery or Human Trafficking reported directly to us or via our whistleblowing procedures.
- we have refreshed all terms and conditions of purchase to reflect current legislation.

Approval for this statement

This statement was approved by group board and is signed on its behalf by

A handwritten signature in black ink, appearing to read "Tom Anwyl", written over a horizontal line.

Tom Anwyl
Board Director
January 2024

Note – this statement covers the practice of Anwyl Group Limited (Company No. 04375093) and its subsidiaries, including the relevant companies according to the requirements of the Modern Slavery Act: Anwyl Construction Company Limited (Company No. 00435323), T. Anwyl & Son Limited (Company No. 00439194) and Anwyl Land Limited (Company No. 10296227).