

# Slavery and human trafficking statement for the financial year ending 31 March 2022

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The Places for People Group (the "Group") operates across the UK through a number of operating subsidiaries. We are one of the largest property and leisure management, development and regeneration businesses in the UK. We own or manage more than 220,000 homes and 99 leisure centres and have assets in excess of £4.9 billion. We provide our services through the efforts of more than 10,000 staff in the UK.

Our services are delivered through 20 principal companies although we arrange our activities so that clients, customers and staff regard all parts of the Group as a single business.

The Group has noted the requirements of the Modern Slavery Act 2015 (the "Act"). This statement is made on behalf of the Group parent, Places for People Group Limited (company number 03777037), and the Group as a whole. The following subsidiaries in the Group are either required to make their own statement under the Act or have volunteered to do so and have adopted this statement:

- Places for People Developments Limited (company number 04086030);
- Places for People Homes Limited (registration number IP19447R);
- Places for People Leisure Limited (company number 08363432);
- Places for People Leisure Management Ltd. (company number 02585598);
- Places for People Living+ Limited (registration number IP20014R);
- Allenbuild Limited (company number 01248351);
- Derwent Housing Association Limited (registration number IP18127R);
- MDH (Group) Limited (company number 09096398);
- Millwood Designer Homes Limited (company number 02704499);
- PfPL (Holdings) Limited (company number 04832063);
- Zero C Group (2008) Limited (company number (07465675);
- Zero C Holdings Limited (company number 06540829);
- Chorus Homes Group Limited (company number 04782653);
- Chorus Homes Limited (registration number RS007813);
- Castle Rock Edinvar Housing Association Limited (registration number SP1767RS);
- and
- Cotman Housing Association Limited (registration number 19473R) (voluntarily adopted).

## Our core businesses

We operate across the whole of the property value chain from initial procurement of sites, through planning and project management to the delivery of high-quality places with supporting infrastructure and strong management.

We deliver services to a range of stakeholders including tenants, landlords, house buyers, local authorities, investment fund managers and leisure centre users.

## Our supply chain

Our large and varied Group business offering is reflected in the breadth and complexity of our UK supply chain that has more than 3,000 established members. We engage with a wide

variety of organisations for a broad range of goods and services - primarily corporate, construction and property related, but also some more specialist requirements.

Our supply chain members are diverse not only in the goods and services they provide, but also in the size and structure of their organisations - from the very small to multi-nationals. We encourage smaller businesses to apply to join our supply chain in order to promote local business initiatives in the UK.

## **Our policies to resist modern slavery and human trafficking**

We have reviewed our existing policies and procedures in light of the Act. We are confident that our policies promote good behaviour among our colleagues at work and within our supply chain. Our policies and procedures are kept under review to make sure that they reflect the changing shape of the Group and of the needs of the people and markets it serves in the UK.

### **In our own businesses**

The policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act in our businesses are:

- Sustainable Procurement Policy;
- Supply Chain Code of Conduct;
- Recruitment & Selection Policy;
- Health & Wellbeing Policy;
- Equality, Diversity & Inclusion Policy;
- Whistleblowing Policy (which makes clear that a report of concern in relation to modern slavery or human trafficking can be made under the protection of the policy);
- Behaviour at Work Policy (which covers conduct at work including fraud response, gifts/hospitality and personal interests); and
- Respect Policy.

In light of the coronavirus pandemic, a number of our policies were reviewed resulting in the following actions being taken.

We have introduced a confidential reporting line accessible to all colleagues (employees, workers, consultants, agency and self-employed contractors), which provides a further route for grievances or whistleblowing complaints to be raised. Cases can be anonymous if preferred with the identity/contact details known only by the external provider.

We continue to carry out right to work checks, under our obligations to prevent illegal working. These are being done over a video call, in line with current Government guidance.

Introduction of the new Respect policy enhances our message around equality, diversity and zero-tolerance of harassment or discrimination.

We did not identify any specific additional risks of modern slavery or human trafficking that were likely to occur in our workforce as a result of the coronavirus pandemic. We will keep the position under review as working practices evolve.

### **In our supply chain**

We are determined that there shall be no modern slavery or human trafficking in our supply chain. Our supply chain code of conduct and sustainable procurement policies evidence our

commitment to act ethically and with integrity throughout our business relationships and all suppliers, no matter how long-standing, are required to abide by them.

Acceptance of the code of conduct is now a mandatory requirement for all suppliers across the Group to ensure we have a robust and consistent approach to modern slavery. The code outlines explicitly to the supply chain what is expected of them in terms of their behaviour and their responsibilities to the Group. It expresses our culture and values and how we expect suppliers to engage with us on matters of modern slavery, reporting and safeguarding.

Our code reflects the requirements of the Act. We have published it to our website, on all new supplier forms, and to supply chain members through our on-line channels to ensure that all suppliers are aware of our expectations. As part of any new vendor selection questionnaire when tendering, adherence to the Act is a mandatory requirement for any new suppliers working for the Group.

We continue to strengthen the relationship with our supply chain members through enhanced enterprise resource systems. These give us better information about more suppliers and make us better able to apply centralised standards across the Group.

To continue to grow our knowledge and push forward with our strategy, we have continued to work with Unseen, the leading charity committed to the abolishment of modern slavery. Unseen have played an active role in the development of codes and policies as well as undertaking an audit on the Group's supply chain. By highlighting good practices, risks and opportunities we are able to address the challenges on modern slavery rather than react to it.

This continued work by Unseen, cements the partnering ethos between the organisations that will encourage the work we do on modern slavery to be delivered in a proactive way that challenges the Group and our supply chain.

Our intention is to create a much wider understanding of modern slavery across departments that often make "buying decisions" at potentially smaller and more local levels. This will create a much wider knowledge in the business of risk management, mitigation and due diligence, identifying hot spots and trends, giving greater supplier engagement and supporting the evolution of policies and practices.

Modern slavery audits have been restricted by the coronavirus pandemic and our ability to visit suppliers safely. We fully intend to resume modern slavery audit activities now it is safe to do so and will use our enhanced knowledge and training from our time spent with Unseen to enrich and improve the quality of these. We will continue to do this in a positive and proactive way to support the supply chain to meet its requirements in relation to the Act.

We have contracts with supply chain members and in many cases those contracts are for several years' duration. We have introduced a contractual requirement for suppliers that they do not engage in any activity that is contrary to the Act. Where a contract has been renewed during the year, or any new contract has been formed, that requirement has been applied, with newly enhanced terms and conditions giving the supplier greater responsibilities and the Group significantly enhanced scope to insist on changed behaviour or to terminate the relationship where the Act is deliberately breached. Over time, we will achieve the inclusion of the contractual requirement in all supplier relationships. Every supplier (whether on a new contract or one formed before the Act came into force) knows that we expect them to avoid modern slavery practices because they are required to abide by the code for supply chain partners. The development of our bespoke contract management system will allow us to

manage suppliers, contractors and processes in a more insightful manner, as well as providing an escalation mechanism for suppliers to be able to report issues in their supply chain relating to modern slavery.

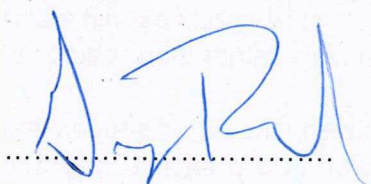
## Training and continuing vigilance

In the previous statement we detailed that, in partnership with Unseen, we had undertaken further training of our workforce to highlight the issues around modern slavery and human trafficking. We have developed our protocols with our procurement supply chain to promote awareness and will continue to do so. Our aim is to share knowledge so that more people are more alive to the relevant risks and know what to do if they have a concern.

We operate mandatory training of our workforce and monitor compliance across the Group.

## Declaration

This statement is made pursuant to section 54(1) of the Act for the financial year ending 31 March 2022 (1 April 2021 to 31 March 2022). It has been approved by Places for People Group Limited's board of directors on 25 May 2022 and the boards of directors of each of the Group's subsidiaries required to make a statement under the Act.



Signed by **GREG REED**, in his capacity as **Group Chief Executive** of Places for People Group Limited.

Date: 25 May 2022