

Slavery and human trafficking statement for the financial year ending 31 March 2026

We are Places for People (the “Group”), the UK's leading Social Enterprise. We change lives by creating and supporting thriving Communities. Our business consists of complementary companies that are market leaders in homes and communities, regeneration and development, investment management, property management and leisure.

The Group comprises 12,900 people who create, manage, and support thriving communities across 260,000 homes, 55,000 of them social homes, and operate 102 leisure centres serving over a million customers.

Using the power of partnership and working collaboratively, almost 12,900 colleagues in more than 20 specialist companies we create Communities and provide People with opportunities and choice in a way that few organisations can match and we arrange our activities so that clients, Customers and Colleagues 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)
- PfPL (Holdings) Ltd (company number 04832063);
- Zero C Group (2008) Limited (company number 07465675);
- Zero C Holdings Limited (company number 06540829);
- Residential Management Group Limited (company number 01513643);
- Derwent Facilities Management Limited (company number 07264667);
- Castle Rock Edinvar Housing Association Limited (registration number SP1767RS);
- Places for People Scotland Limited (company number SC278428); and
- Thriving Investments Limited (company number 09571845).
- Origin Housing Limited (registration number 100008R)

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 5,500 established suppliers. 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 microbusinesses and SMEs to multi-national and international corporations. We actively encourage smaller businesses to apply to join our supply chain to promote local business initiatives in the UK.

Our policies to resist modern slavery and human trafficking

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.

We review the risk and effectiveness of our controls at least annually.

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:

- Procurement Policy.
- Supply Chain Code of Conduct.
- Recruitment & Selection Policy updated to align with inclusive hiring and introduction of assessment tools.
- Health & Wellbeing Policy, amalgamated into a single Group standard.
- Equality, Diversity & Inclusion Policy updated to include legal definition of sex and guidance around single-sex services and occupational requirements and exemptions.
- 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 during video calls, fraud response, gifts/hospitality and personal interests).
- Bullying & Harassment Policy enhances our message around equality, diversity and zero-tolerance of harassment or discrimination.
- Conduct Policy.
- Group Safeguarding Standard.

We continue to provide a confidential reporting line accessible to all Colleagues (employees, workers, consultants, agency and self-employed contractors), to offer 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.

In our supply chain

We are determined that there shall be no modern slavery or human trafficking in our supply chain. In 2025/26 we introduced an improved onboarding process and Supplier Governance Panel which includes enhanced governance checks with expanded sections on safeguarding and modern slavery risk, supplier expectations and legal obligations. With a view to improving early-stage identification of potential risks within the 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 embedded into our supplier onboarding process for all Group suppliers 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 of conduct reflects the requirements of the Act. We have published it on our website, referred to it on all new supplier forms, and notified supply chain members of its existence 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 also conduct modern slavery audits, using the Chartered Institute of Procurement and Supply (CIPS) templates. With over 5,500 suppliers this will always be an iterative and ongoing process. For 2025/2026 Modern Slavery Audits have been completed in high-risk and/or specific industries. 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. Every supplier knows that we expect them to avoid modern slavery practices because they are required to abide by the code for supply chain partners.

Through the Code of Conduct, we ask suppliers to make the Unseen UK Modern Slavery & Exploitation Helpline available to workers as an anonymous route for reporting modern slavery concerns. Concerns can also be reported to the Group Safeguarding team.

Training and continuing vigilance

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 aware of relevant risks of modern slavery and know what to do if they have a concern.

We operate mandatory modern slavery e-learning training for our all our workforce, which staff are required to complete every 12 months, and we monitor compliance across the Group. The training is designed to raise awareness of modern slavery, including what signs to look for,

how this may be relevant to their business activity and how to report any suspected cases. In addition, all managers within the Group attend a 12-month leadership development programme and receive introductory training on modern slavery as part of the managerial responsibilities section.

Declaration

This statement is made pursuant to section 54(1) of the Act for the financial year ending 31 March 2026 (1 April 2025 to 31 March 2026). It has been approved by Places for People Group Limited's board of directors on 20 May 2026 and the boards of directors of each of the Group's subsidiaries required to make a statement under the Act.



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

Date: 20 May 2026