SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR

THE FINANCIAL YEAR ENDED 31 MARCH 2022

INTRODUCTION

Story Homes Limited ("**Story Homes**") published its first modern slavery statement in December 2016. This is the seventh statement made on behalf of Story Homes pursuant to section 54(1) of the Modern Slavery Act 2015 (the "**Act**") and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2022. This statement sets out the steps that Story Homes continues to take to prevent modern slavery and human trafficking in its business and supply chains.

Story Homes fully supports the aims of the Act and is fully committed to ensuring that the company is compliant with the statutory requirements affecting our employees and supply chain.

Like most businesses, we had to adjust our ways of working as a result of the Covid-19 pandemic and we continue to implement working practices and policies to enable safe operations and to ensure that we comply with Government guidance and industry regulatory requirements.

ORGANISATION'S STRUCTURE

Story Homes is an award-winning property developer with 27 schemes in Cumbria, North West and North East England and southern Scotland. The company was founded in 1987 by Fred Story as Story Construction Limited, which later de-merged to become Story Homes and Story Contracting Limited.

Story Homes' head office is based in Carlisle with regional offices in Newcastle-upon-Tyne and Chorley.

OUR BUSINESS AND SUPPLY CHAIN

Our business activities are the acquisition of land for development and obtaining planning permission to construct quality homes for our customers. We provide homes direct to the consumer and comply with the Consumer Code for Home Builders. Going forward we will be registering with the New Homes Quality Board with a view to activating and operating under the New Homes Quality Code early in 2023. Our reputation is firmly built on the quality of our exceptional homes and our high standards of customer service; all of our customers benefit from our customer aftercare package.

In 2021/22, Story Homes built and sold 846 new homes across its three operating regions.

As at 31 March 2022, the company directly employed c. 380 staff working exclusively in the UK and had an annual turnover of approximately £240.7m.

We procure a wide range of goods and services through our supply chain which includes building contractors, subcontractors who provide labour, materials and plant, manufacturers and suppliers, utility providers and a range of other associated trades and professional services connected with housebuilding (collectively referred to as “suppliers” in this statement). We aim to use suppliers that are headquartered locally in relation to the areas in which we operate wherever possible, and they range from SMEs to large corporations.

We usually have a stable supply chain allowing us to benefit from a significant number of long-standing trading relationships with like-minded subcontractors, suppliers and consultants who share our values and ethics. As a result of the aftereffects of the Covid-19 pandemic, labour and materials shortages we have had to use alternative suppliers in relation to some elements of our business; in relation to these suppliers, we carried out proportionate due diligence to mitigate the risks to our business.

OUR APPROACH

Our Board of Directors takes a zero-tolerance approach to human trafficking and modern slavery in our business and supply chains. The Board of Directors has overall responsibility for ensuring that Story Homes complies with its legal and ethical obligations and receives updates on the nature and requirements of the Act, and the impact on our business.

We are committed to ensuring that there is no modern slavery or human trafficking in our business or any part of our supply chain and have in place an Anti-Slavery and Human Trafficking Policy that all our employees must comply with. Should any incident come to our attention, a zero-tolerance approach will be adopted. Our Business Code of Conduct includes a whistleblowing policy, which encourages employees to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain at the earliest possible stage and without fear of retaliation. We will review all instances of non-compliance with modern slavery and human trafficking laws or our policies, on a case-by-case basis, and take appropriate action against any individuals or organisations breaching such laws or our policies.

Our recruitment policy confirms that we require all recruitment agencies engaged with Story Homes to agree to and comply with our Anti-Slavery and Human Trafficking Policy.

We undertake comprehensive pre-employment checks of all prospective employees. We pay a minimum of the National Living Wage to all of our eligible employees and comply with all applicable employment law obligations.
We maintain an internal governance structure at both operational and leadership levels. Whilst the Group Solicitor, together with our senior leaders remain responsible for engagement with our modern slavery processes and procedures, we are focusing on communicating a “whole business” approach throughout our business. This approach will ensure that everyone has the required knowledge to spot the signs and be confident in reporting any actual or suspected incidents of non-compliance with laws on modern slavery and human trafficking or our policies.

We have a training package, which consists of e-learning and site managers are provided with face-to-face training sessions. We have site induction packs which we require staff to self-certify that they have read and understood the information within.

All of our policies and procedures remain under review and adaptable to any changes in risks faced by Story Homes. We have a Compliance Committee which

has undertaken a full review and re-fresh of our policies and procedures (including our standard supplier terms and conditions and related pre-qualification tender process) . This committee comprises representatives from our Legal, HR, Procurement, Commercial and Production departments. This committee will remain as a standing committee to ensure compliance with best practice in our sector and to measure the effectiveness of our policies and procedures. This will include periodic reviews of policies and procedures to ensure they continue to be effective and appropriate.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We have a thorough due diligence process for managing relationships with our suppliers supplemented with a Pre-Qualification Questionnaire to ensure that the risk of modern slavery is assessed prior to the appointment of new suppliers. In view of the challenges currently faced with materials and labour shortages we have during financial year 2021/22 reviewed the existing Pre-Qualification Questionnaire and are satisfied that its contents remain appropriate. We will continue to review it and update it as and when it is considered appropriate to do so.

EVALUATION AND PROPOSALS FOR 2022/23

Given our usually stable supply chain, which comprises of suppliers that share our values, our business is self-assessed as low risk in respect of modern slavery and human trafficking in both our own business and in our immediate supply chain. We repeatedly assess the risk of such practices occurring in our business and our supply chains through our procurement processes. We review our process with reference to Home Office guidance, and focus on recruitment, use of agency and temporary workers, on-boarding of new employees and our contractual terms and conditions with suppliers. We are aware of the risk of modern slavery and human trafficking within our supply chain due to the sector that we operate in, as raw materials may be sourced by suppliers from high-risk countries. We undertake due diligence on these areas and pro-actively seek to ensure that our immediate suppliers understand the risks within their supply chains given that they form part of our overall supply chain.

Over the course of 2021/22 we have set up the modern slavery committee and have undertaken a review of the Pre-Qualification Questionnaire process

Over the course of 2022/23 we will be progressing the following matters:

Proposals for 2022/23	**Comments**
Code of Conduct	We continue to finalise the roll-out of the Code of Conduct, which was delayed as a result of Covid-19. We expect our suppliers, contractors and business partners to uphold this code.

Regular meetings of Compliance Committee	Regular meetings will be held as requested and external support will be provided to facilitate the work of the committee.
Review of Contractual Terms and Conditions and to account for any modifications arising from the New Homes Quality Code	To be overseen by the Compliance Committee and aligned with the review of Pre-Qualification Questionnaire, the introduction of an annual questionnaire to be issued to existing suppliers and ongoing Risk Assessment.
Review of policies and procedures	To be overseen by the Compliance Committee.
Training Sessions	e-learning refresher training to be implemented for all staff.
Review of site induction packs	Review of information provided and self-certification mechanism.
Continue to communicate across our business and supply chains to raise awareness of modern slavery and the risks faced in our sector.	Focus on a "whole business approach" to tackling modern slavery risks.

Whilst we aim to meet 100% compliance on the above proposals by the financial year ending 31 March 2023, we will review progress on a regular basis and report in our next statement against the above.

This Statement was approved by the Board of Story Homes Limited on 21st September 2022

Signed: 

Fred Story

Chairman

Date: 21st September 2022