Appendix 1 – Modern Slavery Statement

This statement on slavery and human trafficking is made pursuant to Section 54 of the Modern Slavery Act 2015.

It is made on behalf of Wheatley Housing Group Limited and its subsidiaries, Wheatley Homes Glasgow Limited, Wheatley Homes South and Wheatley Homes East who had an annual turnover in excess of £36m at the end of their last financial year. It will be updated on an annual basis and approved by the Board of Wheatley Housing Group Limited, and published on our website. The statement is also made voluntarily on behalf of the following subsidiaries: Loretto Housing, Lowther Homes, Wheatley Care and The Wheatley Foundation.

Our statement is submitted to the Government modern slavery statement registry.

This statement was approved by the Board of Wheatley Housing Group on 30 August 2023.

About our Group

We are Scotland's leading housing, care and property-management group and employ over 2,500 people.

Wheatley Homes Glasgow Limited, Wheatley Homes South, Wheatley Homes East and Loretto are subsidiaries of the Wheatley Housing Group Limited, Registered Social Landlords and registered charities. Their principal business is social housing. Lowther Homes (private rented tenancies, mid-market rent and property factoring), Wheatley Care (charitable provider of care and support), and The Wheatley Foundation (charitable support) are also covered by this statement.

We are committed to the highest ethical standards of business and ensuring there is no slavery or human trafficking in any part of our business or supply chain. Each entity in our group complies with applicable human resources legislation and the national minimum wage.

Our supply chain, due diligence and risk

We are committed to developing the economies of the areas we work in and building strong relationships with local suppliers. We operate solely within Scotland and do not have a large global supply chain. Our procurement is undertaken within the context of a wide range of legislative and regulatory requirements, including the Public Contracts (Scotland) Regulations 2015, The Procurement (Scotland) Regulations 2016, Procurement Reform (Scotland) Act 2014.

A contracts register is published on our website which contains details of our main suppliers. We update this annually.

We have a specialist procurement function that has primary responsibility for procuring goods and services on a group-wide basis in accordance with the aforementioned legislation and regulation. High-value contracts require approval by the Board. We encourage our suppliers to sign up to our Wheatley Pledge.

We adopt a Community Benefit approach to our procurement and publish a Community Benefits Statement annually. Monitoring and reporting on this demonstrates that we, our partners and supply chain are making a positive difference to individuals, enhancing communities and supporting wider economic resilience. Through this:

- we require suppliers to declare Fair Work practices within their workforce and sub-contractors, as well as non-discrimination and promotion of Equality, Diversity and Inclusion policies;
- we seek to ensure suppliers' compliance with the Modern Slavery Act 2015. We implement this through the use of clauses in our contract conditions and ensure our commitment is embedded within our procurement strategy
- Community Benefits are built into all contracts where clear benefit(s) can be gained by our communities. Progress on the implementation of Community Benefits will be managed and maintained in line with the Group's Community Benefits Statement.

We have assessed our risk of exposure to slavery and human trafficking as low. Some of the measures that we have taken include:

- Standard contract terms including a provision that requires suppliers to comply with the Modern Slavery Act 2015;
- Annual review of our procurement policy and strategy;
- Refreshed our Fraud, Corruption and Bribery Policy in 2022;
- Refreshing training for staff, including our Passport to Procure e-learning; and
- Requiring a formal declaration from suppliers that they comply with the Modern Slavery Act 2015; and
- Reviewed the Modern Slavery Statements and approaches of our construction framework contractors; facilities management contractor; and security contractor, given these are sectors where there is a risk of forced labour, to confirm we are satisfied with these

Training

We will ensure that relevant sections of our workforce understand the risk to our business from slavery and human trafficking and are equipped to identify and respond in situations where they suspect bad practice. We have our Protecting People policy framework in place to support our staff to identify vulnerable people and have staff training for this also.

This Framework and training ensures our frontline staff who visit tenants and service users are trained to identify signs of exploitation and understand that instances of this should be reported to managers who would then work with other agencies including Social Service and Police Scotland to assess such cases.

Compliance

We will assess any evidence of non-compliance within any part of the Group or by one of our suppliers and take appropriate action.

Grievance mechanisms

Our staff can raise concerns or make complaints in relation to modern slavery and human trafficking through anonymous whistleblowing services, such as a helpline, or through trade unions or other worker representative groups. We promote grievance mechanisms for example, through our whistleblowing policy and video from policy lead highlighting to staff the process for whistleblowing.

Our policies

We operate the following policies, each of which is designed to prohibit discrimination, support legal compliance and best practice:

- Recruitment Policies;
- Employee Code of Conduct;
- Procurement Policy and Strategy;
- Group Sustainable Procurement Policy;
- Whistleblowing Policy;
- Anti-fraud, Bribery and Corruption Policy;
- Equality, Diversity and Human Rights Policy;
- Scheme of Financial Delegation; and
- Group Protecting People Policy Framework