Modern Slavery and Human Trafficking

Ballymore Group - Modern Slavery and Human Trafficking Statement 2023/2024

Introduction from the Board of Directors

At Ballymore Group, we recognise that slavery and human trafficking are significant human rights issues and are committed to taking appropriate and proportionate steps and to continually improve our practices to mitigate the risk of these occurring within our business and our supply chain. This is Ballymore Group's Modern Slavery and Human Trafficking Statement for 2023/2024, which is published in compliance with the Modern Slavery Act 2015 (**MSA 2015**). This statement has been approved by the Board and signed by a Director.

The Organisation

We are a property developer operating within the UK. Section 54 MSA 2015 requires businesses with an annual turnover of £36m or more to produce an annual statement setting out the steps which have been taken to ensure that their business and supply chains are free from slavery.

Over the last year, we, like many other businesses operating in the UK, particularly in the construction and property industries, have continued to experience a challenging business environment. Inflationary pressures have considerably increased the cost of construction with an increase in the cost of building materials, increased energy costs and higher interest rates increasing the cost of development and construction finance.

Our Supply Chain

We procure the majority of our directly sourced materials from UK-based organisations. Please refer to section 4, 'Suppliers', below, for further information.

Due Diligence processes for Slavery and Human Trafficking

The key areas of our operation that give rise to the highest risk of slavery and human trafficking are as follows:

1. **Employees**: our directly hired employees;
2. **Agency Workers**: agency workers working on our behalf;
3. **Contractors**;
4. **Subcontractors**: subcontractor operatives working on our sites; and
5. **Suppliers**: the workforce of our supply chain who supply materials to our business.

As part of our initiative to identify and mitigate risk, we have taken the following steps to mitigate risk in relation to each of these areas are as follows:

1. **Employees:**

    - We verify that all employees have the right to work in the UK upon commencement of their employment.

- We make all employees aware of their working hours, leave and absence entitlements and other employment benefits via the Employee Handbook.

2. **Agency workers**

    - We aim to only engage agency workers that are provided by approved suppliers.
    - We require all approved suppliers to ensure their agency workers have the right to work in the UK and to have procedures in place to minimise the risk of recruiting forced or compulsory labour.

3. **Contractors and Subcontractors:**

    - We require Contractors and Subcontractors to ensure their employees have the right to work in the UK.
    - We consider Contractors' and Sub-contractors' approaches to employee rights and any breaches of human rights-related legislation during our selection process.
    - We ask all site operatives to provide evidence of their CSCS cards.
    - We want all Contractors and Sub-contractors that purchase materials for use on our sites to consider the risk of modern slavery in their supply chain.
    - Our construction contracts contain comprehensive modern slavery and human trafficking provisions. These provisions oblige trade contractors to: i) comply with all obligations under the MSA 2015 (and to take steps to ensure that all sub-contractors and sub-consultants do the same), ii) to warrant that none of its officers, employees or other persons associated with it have ever been convicted of any offence or are the subject of any investigation, enquiry or proceedings regarding any modern slavery or human trafficking offence and iii) to respond promptly to any questionnaire or due diligence enquiries put to it relating to the subject of modern slavery or human trafficking.
    - As part of our pre-qualification process, we undertake pre-qualification verification, in the form of a questionnaire. As of May 2023, we are enlarging the scope of this questionnaire to incorporate more in-depth questioning relating to modern slavery and human trafficking, which contractors and sub-contractors will be required to comply with prior to their engagement.
    - We also engage a number of consultants, including accountants, solicitors, engineers, surveyors etc., however we consider these professions to be at a low risk for slavery or human trafficking.

4. **Suppliers:**

    - We procure the majority of our directly sourced materials from UK-based organisations that are required to comply with UK laws on forced labour. Where materials are directly sourced from outside of the UK we consider the risk of slavery and human trafficking as part of our selection process. This consists of considering the source and jurisdiction of such materials (greater emphasis will be given to materials emanating from a high-risk regime for slavery and human trafficking as opposed to a low-risk regime. Suppliers are also expected to complete and return our modern slavery questionnaire, referred to at point 3, above.

5. **Whistleblowing:**

    - Our whistleblowing procedure allows any employee or third party to confidentially raise a concern.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the year from 1 April 2023 to 30 March 2024. It was approved by the Board on 29 June 2023.