

Modern Slavery Statement 2025/2026

Purpose and scope of this Statement

This Statement is made 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 ending 31 March 2026. In this Statement slavery and human trafficking is referred to as "modern slavery". This Statement applies to all legal entities that form part of The Guinness Partnership Group. The Guinness Partnership's subsidiaries are listed at the end of this Statement.

About The Guinness Partnership

Guinness is one of England's oldest and largest housing associations. We have approximately 70,000 homes and 160,000 residents across England. We are committed to improving people's lives and creating possibilities for them. Guinness Property, our in-house maintenance service, delivers repairs to 58,000 of our homes.

Our activities, delivered by over 2,500 people, comprise developing and managing homes for social and affordable rent and affordable home ownership; and providing support for residents who might need extra help with issues like managing their money or getting into work. Our social purpose means that any surplus we make is re-invested in new and existing homes and improving our services for the benefit of our residents and their communities.

Our activities are regulated by the Regulator of Social Housing.

We have assessed the overall risk of modern slavery within our own business and supply chains to be low given the approach we take to risk management and the controls and assurance frameworks we have in place.

The risk may be higher in relation to our homes as they may be used to facilitate modern slavery given the potential vulnerability of some of our residents. We have measures in place to prevent, detect, investigate and take appropriate action to deal with incidents.

Our commitment

We are strongly opposed to modern slavery. We will do what we can to prevent and combat such abuses in our business, in our supply chains and in connection with our residents.

We act ethically and with the highest standards of integrity, quality, probity, openness and accountability in all our business operations and relationships. We are committed to being open and transparent in how we conduct our business and interact with residents and other stakeholders, and we publish a range of information relating to our approach to transparency and sharing information.

We will not knowingly deal with any business involved in modern slavery. If any instances are identified in our supply chain we will take appropriate action and act in accordance with the law and government guidance. Where a serious breach occurs we may seek to terminate our relationship with the supplier.

In our own business

We will continue to be vigilant and where a compliance breach is identified, we will act promptly, involve the appropriate agencies and feedback lessons learnt in order to minimise the risk of an incident occurring again. We have a modern slavery reporting system so that concerns about staff, suppliers, and our residents may be recorded as they occur.

We have a Staff Whistleblowing Policy which enables all employees or others with serious concerns over any aspect of our work to come forward and express those concerns. If there is a case to answer, the person

concerned would be reported to the relevant authorities and the matter will be dealt with under our Capability, Discipline and Grievance Policy.

All employees of The Guinness Partnership Limited and its subsidiaries are paid the Real Living Wage or above.

Employees who are victims of modern slavery may contact the Employee Assistance Programme provided by an independent health & well-being provider. This provides employees with 24 hours/365 days access to a confidential advice line. They also provide counselling services and legal and financial advice. Guinness would be responsive and supportive to any employee affected by modern slavery.

Our policies, training, internal controls, and regular reporting provide visibility and assurance that risks are minimised. We are not aware of any incidents during the year. However, we will continue to be vigilant and where a compliance breach is identified, we will act promptly, involve the appropriate lead agencies and feedback lessons learnt to minimise the risk of an incident occurring again.

Our supply chain

We engage with a wide variety of organisations for a broad range of goods and services which are primarily corporate, construction and property maintenance-related, but also to meet some more specialist requirements. Our procurement activities take place in England and our contractors and suppliers are predominantly UK based, although their lower-tier supply chains are often not; particularly equipment, components and construction materials.

Higher value and higher risk procurements are subject to enhanced governance, including senior management approvals and additional scrutiny through our procurement gateway arrangements, supported by ongoing contract management and audit activity.

We carry out sample checks of suppliers' Modern Slavery Statements, and all suppliers sampled have published Statements where legally required to do so. In one instance, a supplier reported issues relating to non-compliance with local labour laws and supplier labour standards, which it stated were addressed through corrective and improvement actions (as set out in its Statement).

Our residents

We have a role to play to keep our residents, and the people who live with them, safe so they may live free from abuse and neglect. We operate on the basis that safeguarding is everyone's responsibility and have robust procedures in place so that appropriate action is taken when concerns are raised.

Some of the people we house are vulnerable to modern slavery, as a victim or perpetrator. The form that modern slavery may take includes financial control and abuse, cuckooing and forced criminality.

Our policy framework

Our policies are reviewed at least every three years and are supported by training and effective communication.

Among the policies that are relevant to modern slavery are:

- Allocations
- Anti-bribery & anti-corruption
- Anti-fraud
- Anti-money laundering
- Anti-social behaviour, hate crime and hate incidents
- Capability, discipline and grievance
- Conflicts of interest
- Diversity and inclusion
- Domestic abuse (colleagues)
- Health and safety
- Private use of contractors, suppliers and consultants
- Recruitment & selection
- Resident domestic abuse
- Resident safeguarding
- Payment and benefits

- Staff whistleblowing
- Tenancy fraud.

Among the codes of conduct that are relevant to modern slavery are:

- Code of conduct for staff
- Code of conduct for board members
- Code of conduct of suppliers and contractors
- Code of governance.

In 2025/26, the following relevant policies were reviewed: Anti Fraud; Health & Safety; Resident Domestic Abuse; Resident Safeguarding; and Staff Whistleblowing.

We will continue to review and update relevant policies and procedures as necessary, so that we take effective and proportionate steps to ensure there is no modern slavery in our business or our supply chains.

Risk management, due diligence and monitoring effectiveness

We take a group-wide approach to risk management through our Corporate Risk Plan and supporting Risk and Risk Management Strategy. Our approach enables us to consider the full spectrum of risk and manage the combined impact of those risks. Potential risks are mitigated by our policies and procedures, controls built into our business operations, internal audits and the knowledge, skills and behaviours of our staff. Examples of these controls include financial regulations, codes of conduct, staff training and performance monitoring. This provides assurance that the risks are minimised.

On an annual basis we complete a modern slavery risk assessment for each of the relevant departments, to evaluate and monitor the effectiveness of the controls in place to mitigate the risk of modern slavery.

Our potential modern slavery risk areas are building construction works, repairs & maintenance works, in the sourcing of raw materials by our contractors, and contract/temporary staff. Additionally, some of our residents may be vulnerable to modern slavery. Information about these risks is included below.

Building construction, repairs and maintenance works

Risk is most likely to arise with Small and Medium-Sized Enterprise (SME) contractors. We manage this risk through:

- Scrutiny in our processes for major procurements, which are covered by either the Procurement Act 2023 or Public Contracts Regulations 2015. Both of these assess compliance with the Modern Slavery Act 2015 and require that any contractors that are not meeting their responsibilities in relation to modern slavery are excluded where they are identified as non-compliant.
- Conducting due diligence on all suppliers being awarded contracts or being onboarded. Our checks include a modern slavery compliance self-declaration. These declarations are refreshed annually to ensure statutory obligation compliance.
- Extension of checks to suppliers for complex contracts, including those involving significant subcontracting arrangements.
- Protecting our construction of new homes with our Employers' Requirements, schedule of services and appointment documents for consultants.

The sourcing of materials and components

There is a risk in the sourcing of these items by suppliers as materials may be from countries where slavery is more prevalent. To mitigate these risks, we include modern slavery clauses in contracts. Whilst our direct suppliers will typically operate within the UK, we ensure there is appropriate due diligence on any contract awards involving major elements of supply from abroad, such as including tender questions exploring supply chain risk and exploration of unexpectedly low costs. Our suppliers are managed by designated contract managers and regular contract management meetings are held.

Our robust tendering process and due diligence ensures we engage with reputable contractors and suppliers who adhere to all appropriate legislation, regulation and practices. Our contract management arrangements help us ensure contractors maintain the standards required, including the prevention of modern slavery.

Our risk exposure to building construction, repairs & maintenance and supply of materials and components has remained the same during the year.

Contingent (i.e. contract and temporary) staff

There is a risk associated with having a large number of contractors and agencies to supply staff for service contracts as the potential for risk may increase with the number of contractors involved. We control this by using reputable, well-known contractors and agencies with whom we have enjoyed a strong relationship. Self-certification processes are used to check legal compliance, and evidence is required to corroborate that specific vetting checks have taken place in respect of the staff. Guinness only uses agencies sourced from our approved list. Most of our supported housing agency staff are supplied by large registered providers taken from local authority approved lists and are required to produce a modern slavery statement in their own right.

Our exposure to agency staffing risks has remained the same during the year. The level of risk in our office service contract is low as we work with a single national contractor and have robust contract management arrangements in place.

Residents

During the year, we became aware of some residents being exploited. Most of the cases relate to cuckooing whereby offenders take over a person's home and use the property to facilitate exploitation. Where we became aware, if requested to do so, we helped the police to gather intelligence so that enforcement action may be taken against the criminals. We additionally supported the police and multi-agency partnerships to assist the victim, by enabling or providing rehousing, or where it was appropriate to do so, by improving the security of the property.

In supported housing and foyer settings, staff are trained to work in a trauma-informed way and to recognise indicators of exploitation. Residents are provided with practical support such as access to translation services, tenancy-readiness training and employment advice. We maintain regular follow-ups with these residents. These measures help to reduce the risk of residents being drawn into exploitative situations, including informal or unsafe employment.

Recorded instances of modern slavery affecting our residents decreased slightly, during 2025/26, compared to 2024/25.

Training and awareness

We continue to raise staff awareness and we provide modern slavery information to our suppliers and contractors, where appropriate.

Guidance is available to staff about modern slavery and how to report it. We deliver safeguarding training and domestic abuse training, which is mandatory for all relevant staff, including those who are resident facing. We have video based learning content on modern slavery and how to manage cases affecting residents. Additionally, an eLearning course on Modern Slavery and Human Trafficking is available to all staff.

Action taken during 2025/26

During 2025/26 we:

- Launched the Knowing Our Residents Project, to improve the accuracy and quality of resident data. This can help us identify residents who may be at risk of exploitation or require additional support to prevent modern slavery.
- Reviewed our Resident Domestic Abuse Policy and Resident Safeguarding Policy to reflect our operational practices, including where we may identify and take action against signs of modern slavery with our residents.
- Introduced a new Cladding Remediation Framework, covering a range of works, all managed through one streamlined group of suppliers, to strengthen oversight of our supply chain.
- Introduced quarterly face to face performance reporting for our agency managed schemes enabling greater oversight of potential modern slavery risks affecting residents.
- Strengthened supplier oversight through consolidation of supply chains in estates, repairs and workspace services, reducing reliance on smaller or unknown subcontractors.

- Continued the insourcing of estate services, where appropriate, increasing direct oversight of the workforce delivering services in our communities.
- Maintained oversight of contractor activity through external audits, including contract management, and compliance reviews to provide independent assurance.
- Embedded trauma-informed safeguarding practice within supported housing and the foyer, recognising the vulnerability of some residents to exploitation and ensuring staff are equipped to respond appropriately.

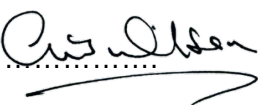
In 2026/27, we will continue to develop, implement and enforce processes and controls that seek to ensure modern slavery is not taking place within our business, our supply chains, or in connection with the residents we support. We will begin the re-procurement of external suppliers for repairs and cleaning services for our estates to help ensure the risk of modern slavery within our supply chain remains low.

Compliance

We have not identified any breaches of the Act in our business or our supply chains during 2025/26.

This Statement was approved by the Board. It will be reviewed on an annual basis.

Date of approval: 24 June 2026

Signed.....

Date: 24 June 2026

This Statement applies to The Guinness Partnership Limited (Charitable Community Benefit Society 31693R, Registered Provider of Social Housing 4729) and its subsidiaries as follows:

- Guinness Housing Association Limited - Non-Charitable Community Benefit Society 17017R. Registered Provider of Social Housing L2441
- Shepherds Bush Housing Association - Non-Charitable Community Benefit Society 16442R. Registered Provider of Social Housing LH0050 (inactive)
- Guinness Developments Limited - Private Limited Company, 04175094
- Guinness Homes Limited - Private Limited Company, 05710006
- City Response Limited (trading as Guinness Property) - Private Limited Company, 4471280
- Hallco 1397 Limited - Private Limited Company, 05998281 (inactive)
- Guinness Platform Limited - Private Limited Company, 06411652 (inactive)
- Live Well at Homes Limited - Private Company, 04767426 (inactive)
- SBH Developments Limited – Private Limited Company, 05843583 (inactive)