

Modern Slavery Statement

Who we are

We are community focused; a charitable housing provider with a social purpose and a registered subsidiary (Heart of Medway Housing Association). Owning and managing over 10,000 homes across the group, we are Kent's largest independent landlord, and our customers are at the heart of everything we do. We change lives and make a difference because we believe everyone needs a safe, secure, affordable home as a steppingstone towards a better future. Our ultimate goal is to help end the housing crisis in North Kent, and so, in 2025/26 we:

- Built 112 new homes
- Provided a home for over **583** households (of which 190 moved into supported accommodation)
- Let 22.3% of our homes to people that were previously homeless

Statement of Intent

Modern slavery can be defined as various forms of exploitation where individuals are forced, coerced, or deceived into labour or services, often through threats or abuse, with little or no freedom to leave. It encompasses practices such as forced labour, human trafficking, debt bondage, and servitude, and can occur in many different industries.

1. mhs are committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure we remain fully compliant with the Modern Slavery Act 2015.
2. mhs are committed to upholding human rights and to taking steps to ensure that modern slavery and human trafficking are not taking place in any part of our business or supply chains and have a zero-tolerance approach to modern slavery and human trafficking in all its forms. We are committed to ensuring the safety and well-being of our residents, employees, and all individuals involved in our operations and in providing enhanced support and protection for victims.
3. Our Modern Slavery Statement applies to all entities within the mhs homes group. We are committed to renewing our modern slavery statement annually and reviewing any measurables that are outlined in the statement.
4. Being compliant with the Modern Slavery Act 2015 gives law enforcement the tools to fight modern slavery, and to ensure perpetrators receive suitably severe punishments for these appalling crimes.

Procurement

We have a dedicated procurement team who adhere to all relevant procurement policy and legislation. As a result, we can fully consider quality, price and purpose prior to making buying decisions. We have contract managers in place for every supplier we use, which enables us to always achieve and maintain the highest standards possible. We only use specified, reputable employment agencies to source labour.

This statement extends to all our suppliers as well as their subcontractors and we expect the same high standards from all. We also expect our suppliers to hold their own suppliers to the same high standards.

In 2025/26, we have improved transparency and made clear our commitment to safeguarding and combatting Modern Slavery with a new webpage dedicated to procurement. We state our expectations in that we will only work with suppliers who share our company values, behaviours and ambitions. It is important that our suppliers' work ethics and values mirror ours as our success comes not just from our own high standards, but from that of our suppliers as well.

Our supply chain is wide-ranging and supports every part of how MHS Homes delivers safe, good-quality homes and services. It includes organisations that provide:

- Goods and services for the construction, repair and maintenance of our homes, including building contractors, specialist trades, materials suppliers, and technical service providers.
- Goods and services that support the running of our offices and the delivery of customer services, such as facilities management, IT systems, professional services, and operational equipment.
- Employment agencies and staffing providers who supply temporary and permanent personnel across the organisation.

Given the diversity of our supply chain, we recognise that different areas of our operations may present varying levels of risk in relation to modern slavery and labour exploitation. We therefore expect all suppliers—regardless of size, sector or location—to operate ethically, uphold workers' rights, and ensure that no form of forced labour, trafficking or exploitation takes place within their business or any part of their subcontracting arrangements. In line with our procurement policy and all relevant procurement regulations, we only work with reputable organisations that can demonstrate robust employment practices and compliance with the Modern Slavery Act 2015. We continue to strengthen our due-diligence processes, contract management arrangements and supplier engagement activity to monitor standards, identify potential risks and take appropriate action where needed, ensuring we maintain the high levels of compliance and integrity expected across the mhs homes group.

We follow the most up to date Procurement Directives as good practice as well as to ensure that any safeguarding incidents raised by our suppliers are acted on as necessary. We annually check for our contractors supplier's Modern Slavery Statement status – at year end 2025/26 suppliers are 100% compliant. For regulated, above threshold procurements, suppliers are asked to confirm as part of mandatory exclusion criteria that they do not, have not and have never been involved in modern slavery or human trafficking. If they have been, they would be excluded from the process assuming suitable self-cleaning had not been undertaken. We have a supplier code of conduct which references the MHS safeguarding adults policy (this policy also applies to contractors working on behalf of MHS Homes). Suppliers must adhere to this. In addition, all MHS standard goods and services agreements contain Modern slavery clauses.

MHS Homes regularly review all Procurement Policy Notes (PPN's) issued by the government in relation to Modern Slavery. This ensures MHS Homes' procurement policies and procedures always meet the latest government requirements for Public sector procurement. The Procurement Act 2023 introduced provisions for the debarment of suppliers involved in modern slavery. MHS Homes must, and do, check the debarment list in each procurement and exclude suppliers if they are on the list.

All our contractors and suppliers are UK based, and we are committed to using small / local firms wherever possible, allowing us to develop close working relationships. This also links into our commitment to Social Value and Responsibility, Real Living Wage, Sustainable Procurement, a priority on supporting the local economy, and in working collaboratively with our suppliers (and their suppliers) to phase out, and, ultimately, put a stop to all forms of slavery and human trafficking.

We carry out an annual contractor health check to clarify and confirm that suppliers are compliant and meet the following requirements:

All employees

1. Are legally able to work.
2. Have freely chosen employment (no forced or bonded labour)
3. Have a written contract.
4. Have not had to pay fees or lodge documents to obtain work.
5. Understand their statutory rights (i.e. sick pay and holiday pay).
6. Are paid in accordance with national law.
7. Are working in a safe and hygienic environment.
8. Are not expected to work excessively long hours and that working hours comply with national laws and guidelines.
9. Assess quotations and fees from any agency or supplier providing unusually low rates when compared with industry standards.

The percentage of compliant suppliers at the end of March 2026 is 100%.

Our Customers & Properties

We understand that our customer base is representative of a diverse set of backgrounds and needs, and that isolated customers or individuals with vulnerabilities may be especially at risk. We will, therefore, carry out processes to help us identify any at risk or vulnerable residents or groups in our properties.

We carry out home plan visits on a targeted basis, using a variety of indicators. These might include customers we haven't heard from for some time, customers with vulnerabilities, or those living in areas where we have identified neighbourhood issues such as ASB. We carry out ID and condition of property checks to ensure that homes are allocated appropriately, in addition to discussing individual needs. We will ensure that all our staff who visit customers' homes have completed the appropriate safeguarding training and understand fully how to raise/report any safeguarding concerns they may have. We will ensure that we utilize our partnerships with external organisations to share intelligence, which will better our ability to identify where Modern Slavery could potentially be taking place. We have a safeguarding board and operational group to ensure we have appropriate oversight internally.

We recognise that the use of our homes to facilitate Modern Slavery is a risk, and so, any suspected cases of tenancy fraud are investigated and reported to our Finance, Risk and Audit committee quarterly. Likewise, any tenancy found to have been granted on a fraudulent application will be terminated through the appropriate mechanisms.

As part of the annual report to the Group Board we will confirm how many tenancy audits have been completed against the target and by exception how many safeguarding issues were raised.

Our Staff

We pride ourselves on being an employer of choice. We hold Gold Accreditation for Investors in People. Our Leadership Behaviour Framework is just one way that we seek to encourage and empower staff across all levels to solve problems. We believe that everyone has a crucial part to play in tackling Modern Slavery and Human Trafficking, and we will continue to do all we can to raise awareness so that staff are able to understand, identify and report on any potential risks.

We ensure that all relevant processes to ensure compliance with UK employment law are drawn upon at all times. This includes a commitment towards paying salaries in accordance with the Real Living Wage (as set by the Living Wage Foundation), and the National Living Wage for apprentices.

All our staff-based policies and procedures, including our safeguarding and domestic abuse policies, comply with UK employment law and work to mitigate the risks posed by Modern Slavery and Human Trafficking as follows:

- All new employees go through robust vetting procedures and ID confirmation
- Any temporary staff are sourced through reputable agencies and under the supervision of the HR and procurement teams
- All staff must complete mandatory training in the form of e-learning, including health and safety and we monitor and report on the total percentage of staff who do so
- Staff who are in roles where they support our customers must complete additional face-to-face training on various aspects of safeguarding including Modern Slavery
- The correct posts are in place for us to ensure the effective management of the risks associated with Modern Slavery – namely, Procurement Manager, HR Manager, Learning & Development Business Partner and Finance Director
- We have adopted the NHF Code of Conduct for staff, trustees and involved residents which makes clear the actions and behaviour expected when representing the organisation. We aim to maintain the highest standards of employee conduct and ethical behaviour when working or managing our supply chain.

Sharing this Statement

We produce an annual report on all measurables to show compliance with this statement. This report is provided to all Boards along with any tenancy fraud cases via the Fraud and Whistleblowing Report to our Finance, Risk and Audit Committee. The statement is affirmed at all Boards annually. We also share this statement with our staff and regularly promote our whistleblowing procedure to ensure that staff are aware of how to raise any concerns.

Although we perceive the risks within our business to be low, we seek to constantly measure our performance in the fight against Modern Slavery and Human Trafficking, so we can see where we're on track and where we need to improve. For instance, we regularly review our existing policies to make sure that they demonstrate best practice and to mitigate against potential risks.

Future Steps

- We will continue to have high expectations of our suppliers and their supply chain, ensuring that our code of conduct is adopted and our requirements are met.
- We will keep our procurement webpage under review including the information on Modern Slavery and safeguarding.
- We will continue our recruitment training for managers under our licence to manage

- We will ensure that we deliver training bespoke for staff groups so that all staff recognise the importance of The Modern Slavery Act 2015, and where this sits in comparison to other relevant policies within the field, such as whistleblowing, safeguarding and safer recruitment, so that we remain fully compliant at all times.
- We will seek to make a minimum of 1,000 homeplan visits using a risk-based approach for any concerns including safeguarding and Modern Slavery.
- We remain committed to the Real Living Wage.

References:

- (1) <https://www.gov.uk/government/publications/modern-slavery-and-public-health/modern-slavery-and-public-health>
- (2) <https://www.gov.uk/government/collections/modern-slavery-bill>