

Modern Slavery Act Transparency Statement

Statement further to the Modern Slavery Act 2015 (section 54(1), Transparency in Supply Chains)

Newlon Housing Trust and our organisational structure

Newlon Housing Trust is a 'not for profit' Community Benefit Society and a charitable housing association. Newlon owns or manages around 8,000 affordable homes, primarily in eight boroughs in north and east London. Newlon is the parent company of the Newlon Group, which consists of six organisations: Newlon Housing Trust and its five subsidiaries – Outward, Newlon Fusion, NewlonBuild, Access Homes and NewlonInvest. Although the subsidiaries are not subject to the requirement to publish a statement, the same standards of probity and governance apply across the Group. Newlon has an annual turnover of £91.975m, in excess of £36m required for publishing this statement.

Procurement and supply chain

Both our business and procurement activities take place in the United Kingdom, mainly England. We partner with a contractor to deliver repairs and property maintenance activities and as well co-operate with other developers and housing associations. We expect and ensure that our partners follow the same values as us. Newlon Housing Trust ensures that there are no acts of human trafficking or modern slavery inside our business or in our supply chain. Newlon's Code of Conduct for contractors sets clear expectations for a responsiveness to diversity and a high level of professionalism.

Our procurement policies are reviewed regularly. Besides, we benefit from clear employment procedures that ensure that our employees have a right to work in the UK and are paid a fair and legal wage. Staff are expected to conduct business with the highest ethical standards, including compliance with statutory obligations.

Relevant policies and controls

Newlon's governance arrangements, policies and procedures, and internal controls mean that the risk of modern slavery and human trafficking in its business and supply chain remains low.

Relevant policies and controls are listed below:

- Standing Orders and Terms of Reference
- Procurement procedures
- Standard Terms and Conditions
- Code of Conduct for Contractors
- Staff Code of Conduct
- Whistle-blowing/Public Disclosure and Safeguarding Policies and Procedures
- Diversity Policy and Statement
- Internal Control Statements
- Group Audit and Risk Committee
- Development Committee
- People and Governance Committee
- Resident Scrutiny Panel
- Right to Rent checks
- Robust recruitment process to verify identity and check new employees' right to work in the UK
- Anti-Money Laundering Policy and Procedure
- Group Anti-Fraud and Corruption Policy
- Domestic Violence Policies and Procedures
- E-learning module on SkillGate (Newlon's learning and development platform)

Training

Newlon's employees undertake mandatory training as part of their induction which are relevant to mitigating the risks around Modern Slavery, such as on equality and diversity, unconscious bias and procurement policies.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Newlon Housing Trust's Modern Slavery Act Transparency Statement for the financial year ending 31st March 2022.

Newlon will review actions taken and controls to mitigate the risk of Modern Slavery and this statement for suitability at least annually or whenever there is a change in legislation, which is monitored through reporting to the Board. This statement will be communicated to all Newlon staff, published on Newlon's website and on the Modern Slavery Statement Registry.



Mike Hinch

Group Chief Executive

Date of Board approval: 13 July 2022