

Modern Slavery and Human Trafficking Statement

For the Financial Year ending 31 March 2026

1. Introduction

The Modern Slavery Act 2015 (the Act) seeks to prevent the exploitation of workers and to stop human trafficking. It requires organisations supplying goods or services with a turnover of above £36m to prepare and publish an annual Modern Slavery and Human Trafficking Statement.

In this statement we outline the steps we've taken to target Modern Slavery for the financial year ending 31 March 2026, which covers the period 1 April 2025 to 31 March 2026. This was the period before Chelmer Housing Partnership (CHP) and Estuary Housing Association merged to become Delta Housing Association (referred to as Delta in this statement).

We'll continue to examine the effectiveness of our approach to ensure continuous improvement for Delta. We'll review and update this statement every year and publish this on our website.

2. Our commitment

With a strong commitment to social responsibility, Delta rigorously complies with its legal and regulatory responsibilities under the Modern Slavery Act 2015. We take a proactive approach to ensuring that slavery, human trafficking and exploitation do not exist within any part of our business or supply chains.

We recognise the detrimental effect modern slavery has on global society and are committed to acting ethically and with integrity within our business and with others to combat this. We take care to ensure modern slavery and human trafficking are not taking place in our business or supply chains through implementing and enforcing effective systems and controls. Consequently, we will not knowingly deal with any business involved in modern slavery.

This statement sets out how we deliver our commitment to improving our practices to combat modern slavery and human trafficking in our corporate activities and supply chains.

3. Our structure and purpose

We are an exempt charity and Registered Provider of Social Housing (registered in England). The Group's principal activities are the development, management and maintenance of good quality social, affordable and market rent housing, and the provision of supported living services.

The Delta Group consists of one registered provider (Delta Housing Ltd) and five subsidiaries (Myriad Homes Ltd, Myriad Housing Ltd, Myriad Capital Plc, Accession Homes Limited and

Estuary Homes Design Limited). Delta Housing Ltd is the parent company of the Group and a charitable registered provider regulated by the Regulator of Social Housing, Care Quality Commission and the Financial Conduct Authority. Delta was formed when CHP and Estuary Housing Association merged on 1 April 2026.

We own and manage over 17,000 homes, principally across Essex, but also in Suffolk and the London boroughs of Redbridge, Havering, and Barking and Dagenham. We employ over 650 employees.

Delta’s corporate priorities are:

- Better and quicker services for customers.
- More homes and better homes for Essex.
- A financially resilient organisation with capacity to invest.
- The largest Essex-focused landlord, rooted in local communities.
- A strong employer and a great place to build a career.

Our core purpose is to provide homes to those in greatest need. We also build and develop open market housing to help subsidise the development of even more affordable homes. We are transparent in reinvesting our surpluses to fulfil this social purpose.

Our approach to combatting modern slavery and human trafficking is in keeping with our social business purpose, our desire to demonstrate ethical business practices that are aligned with our ethos, and to meet our legal and regulatory duties.

4. Risk assessment and management

Our business

Although we consider the risk of modern slavery and human trafficking within our operations is low, we will be vigilant and ensure any instances of modern slavey or human trafficking identified are appropriately dealt with and reported, so that lessons can be learnt and future incidents avoided. All employees are provided with mandatory health and safety training as part of the induction process to ensure that they can work in and contribute to a safe working environment. Risk assessments are regularly completed to assess the safety and appropriateness of working environments for all employees, whether working in Delta’s premises, in the community or at home.

Supply chains

Delta has zero tolerance to slavery and human trafficking, and we expect all our supply chain, consultants, and contractors to comply with our corporate values. Our supply chains are drawn mainly from the construction, property maintenance and supported living. Delta has assessed the risks of modern slavery and human trafficking in our operations as:

High risk	None
Medium risk	Supply chain linked to house building and property maintenance.
Low risk	Supply chains in the provision of agency staff in supported living.

5. Employee due diligence

We have robust recruitment processes, which includes verification of a person's identity and their right to work in the UK before they start work with us.

We monitor rates of pay and the calculation of legal deductions. We're accredited as a Real Living Wage employer and pay at least the Real Living Wage. We provide all employees with core organisational benefits. We make salary payments directly to employees and never delay, defer or withhold payments unless there's prior agreement or notification. In addition to this, we check duplicate bank account details every month.

We'll only recruit temporary staff from specified, reputable employment agencies. We prohibit child labour and the use of worker-paid recruitment fees. We'll never confiscate employees' original identification documents, and everyone has the freedom to end their employment. We encourage employees not to work more than the number of hours permitted by law and don't require any compulsory overtime.

We support the freedom of association. This is the right to of a person to associate with any group they wish, including joining or leaving the group, and for the group to take collective action on behalf of its individual members. An example is joining trade unions.

Our free, comprehensive 24-hour Employee Assistance Programme offers guidance and counselling relating to both work activities and personal lives of our colleagues.

We expect these principles to apply to employment of people within our supply chain as well as our own operations.

6. Supply chain due diligence

Our supply chains include goods and services for the construction, repair and maintenance of residential homes. We also purchase goods and services to facilitate running our office premises.

We don't condone any activity which constitutes modern slavery or human trafficking under the Modern Slavery Act. We expect our suppliers (and our supply chain) to maintain the same approach and to have policies and procedures in place to minimise the risk of modern slavery or human trafficking occurring.

We have a Procurement and Contract Management Policy. We're committed to the effective management of our third-party expenditure and supplier arrangements. To reflect our commitment, we have a dedicated Procurement and Contract Management Team. We require our supply chain to sign a modern slavery declaration before they can start to work with us, provided services or deliver goods to us. We ask our supply chain to sign a declaration on an annual basis once appointed.

As we're based in and operate solely within the UK, we've identified that our overall exposure to the risk of slavery and human trafficking is low. However, within our business, we pay particular attention to construction contracts and the use of sub-contracted labour.

We conduct robust due diligence on the companies we work with. All existing suppliers of products, goods and services have been asked to confirm that they, and any subcontractor they employ, comply with the Act during tendering and onboarding. All new partners will be required to confirm that they comply with the Act as part of their contract with us, regardless of contract value or service type. We ask suppliers to confirm again on an annual basis.

We'll continue to monitor supplier compliance with the Act and to take appropriate action if they are found to be non-compliant or practices are identified as unethical or high risk.

7. Policies in relation to slavery and human trafficking

We don't have a specific policy regarding modern slavery but consider modern slavery as part of the overarching statement that feeds into all elements of our Policy and Strategy Framework, including our Procurement and Contract Management Policy, Confidential Reporting (Whistleblowing) Policy and Safeguarding Policy. Our policies and procedures help identify cases of modern slavery and human trafficking in our supply chain, our business and our communities.

As a housing provider, we have policies and processes in place that assess and monitor the people who we house. We ensure, through the management of our buildings, homes and neighbourhoods, that our properties are not used for the purposes of trafficking or allowing modern slavery to take place. Our legacy Tenancy Policies promote fair, transparent tenancy offers that are responsive to individual needs. Through pre-tenancy risk assessments and sustainability checks, we seek to identify and support customers with support needs, thereby reducing the risk of exploitation and strengthening tenancy security and independence. These measures reduce the risk of coercion, abuse and exploitation, and contribute to our zero-tolerance approach to modern slavery across our housing services.

If we have concerns, we address these in line with our wider safeguarding approach, as detailed in our Safeguarding Policy.

We have an Equity, Diversity and Inclusion Statement, setting out our commitment to go beyond our duties under the Equality Act 2010, tackling inequality in its widest sense and challenging discrimination based on a variety of social and cultural characteristics.

In addition, our legacy and Delta Human Resources policies commit us to the fair treatment of all, free from prejudice and discrimination. We expect everyone to conduct themselves in a professional, respectful and courteous manner, and to expect the same in return.

8. Monitoring and evaluation

We've have established a set of metrics to monitor compliance with the Modern Slavery Act 2015 and to report continuous improvement and progress over time.

We will continue to review and update our employee policies relating to fair and safe working conditions.

We will also continue to increase the monitoring of key suppliers in 'at risk' business industries and start to review construction contracts and the supply chain if the potential risk of modern slavery and human trafficking increases.

9. Training on modern slavery and trafficking

Our employees have mandatory modern slavery training. Through this, employees are advised what they should do in the event they become aware of any indication that:

- an employee of a provider of products goods or services to us appears to be the subject of slavery;

- a customer may be involved in assisting some form of slavery, for example, by allowing or facilitating multi-occupation of their home (fully or partially).

Relevant employees involved in procurement, contract management and safeguarding receive training on modern slavery risks, indicators and reporting mechanisms. We also share expectations with suppliers and contractors through procurement documentation and contract management processes.

Employees are required to report any suspicion of a breach of the Act in line with our Whistleblowing (Confidential Reporting) Policy. This policy ensures full protection to anyone reporting a concern. This policy is available on our intranet, website and through the procurement process. We support anyone working for us directly, or indirectly through a supplier, who raises any concerns about actual or suspected criminal offences, including modern slavery or human trafficking. We continue to operate in accordance with the NHF Code of Conduct, previously adopted by the legacy organisations, which sets expectations for ethical behaviour across our workforce.

We continually seek ways to raise employee awareness of the risks of modern slavery and human trafficking, including through refresher training.

10. Non-compliance

If we identify modern slavery practices in either the provision of a supplier contract or the Delta business, we will:

- notify the appropriate law enforcement agency/ies;
- work openly and proactively with key stakeholders to resolve issues and change working practices;
- support people who are impacted, including considerations in line with our Compensation Policy.
- consider terminating the contract (if applicable).

11. Approval

This Statement is made under section 54(1) of the Modern Slavery Act 2015. It was approved by Delta's Board on 25 September 2026 and applies to all companies within the Delta Group. The Statement will be reviewed annually and approved by Delta's Board, applying to all entities within the Group.

Signed

Paul Edwards
Chief Executive

Date: September 2026