

2025/26 Modern *Slavery Statement*

Accent

This statement sets out Accent Group's commitment to preventing *human trafficking, slavery, servitude and forced or compulsory labour* in all its business activities and within its supply chains.

It outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2015 (MSA). This statement applies to the financial year ending 31 March 2026.

Organisational structure

Accent Group Limited (AGL) is the parent company of the group and is a non-asset-owning Registered Provider of Social Housing. Accent Group Limited has one direct subsidiary company: Accent Housing Limited, which is an asset-owning Registered Provider of Social Housing. Accent Housing is a national social housing provider, owning and managing circa 22,465 homes in England. Accent Housing Limited (AHL) is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014. It is also a registered provider of social housing with the Regulator of Social Housing.

Accent Housing Limited has two further subsidiary companies: Accent Homemade Limited which is the vehicle for overseeing the funding associated with development schemes and Accent Capital plc which is a company set up specifically for the oversight and administration of our listed bond financing. All subsidiary companies are wholly controlled within the group structure.

Our modern slavery statement applies to the whole Group, and all parts of the Group are expected to minimise the risks of slavery and human trafficking in their business supply chains. We have taken steps to satisfy ourselves that the supply chain for AGL is satisfactory in terms of meeting the requirements of the MSA, and also meeting any formal requirements that we set out for our suppliers.

Compliance responsibility

Responsibility for compliance with the MSA rests at the highest level with our Board of Management, with operational compliance responsibility assigned to the Head of Procurement and Supply.

Accent Group is committed to dignity at work and fair treatment of all colleagues. Preventing, detecting and reporting concerns about modern slavery, is the responsibility of everyone who works for us. This includes speaking up when something doesn't feel right, making ethical decisions and taking responsibility for raising concerns.

Our customers and properties

We believe that every person has the right to live in a home where they are free from harm and feel safe. As a landlord we have a duty of care to respond, protect and support people who may find themselves in vulnerable / high risk situations and circumstances and have the necessary policies and procedures in place to help us do this. We work with people, multi-agency partnerships and organisations where needed to prevent and reduce both the risks and experience of abuse or neglect.

Our policies

We operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

Dignity at Work Procedure

Our Dignity at Work Procedure provides colleagues with the necessary guidance to carry out their work in the right way and reflect our core values and expected behaviours. Our procedure makes it clear that Accent have a zero tolerance in relation to discrimination, harassment, victimization, acts of aggression, or sexual misconduct.

Employee Handbook

Our values and behaviours are at the heart of everything we do and therefore we expect all employees to live by these throughout every aspect of their work. Should an issue arise, colleagues will refer to our policies and procedures to manage the situation.

Equity, Diversity and Inclusion Policy

We are committed to creating a dynamic and inclusive working environment – where all colleagues feel valued for who they are, enabling them to thrive at work. The Equity, Diversity and Inclusion Policy also covers expressing these values in interactions with customers, which is embedded through the policy and mandatory training upon onboarding and annual review.

Procurement policy

We expect our suppliers to have the same high standards as we impose on our own business operations. Our procurement policy and supporting procedures contain checks and controls designed to help us verify that any potential suppliers that are subject to the MSA are committed to making sure that slavery and human trafficking is not taking place within their own supply chain.

Safeguarding Policy, Anti-social Behaviour & Hate Crime Policy and Domestic Abuse Policy

Our policies and supporting procedures highlight the potential risks and how to report concerns.

Talent Acquisition (Recruitment) Policy

We operate a robust recruitment policy which includes conducting checks on all prospective colleagues to verify that they are eligible to work in the UK. Pre-employment checks, including Disclosure and Barring Service (DBS) checks, will be carried out for all roles at a level proportionate to the responsibilities of the role. As a minimum, this will include a basic DBS check. Roles involving work with vulnerable customers, access to sensitive information, or higher levels of trust will require standard or enhanced DBS checks, in line with legal eligibility and organisational risk assessment.

We have an in-house Talent & Resourcing Manager who co-ordinates recruitment activities across our organisation, developing our processes and bringing best practice into the organisation. Accent is a Real Living Wage employer, meaning all Accent employees receive a living wage as defined by the Living Wage Foundation.

Whistleblowing policy

We operate a whistleblowing policy so that all colleagues know that they can raise legitimate concerns about how colleagues are being treated, or practices within our business or our supply chain, without fear of reprisal.

Risk assessment

We carry out an annual review of our approved supplier list to assess the risk of modern slavery within our supply chains. This assessment considers factors such as the type of goods or services provided and known sector and geographic risk indicators. Our higher risk supply chain activity is primarily associated with services and supplies supporting our repairs and maintenance programmes and building development activities. While our direct suppliers are typically UK based, we recognise that some goods and materials used within these services may be sourced through wider, multi-tier supply chains, which can include international elements.

We operate a centralised purchase to pay system that restricts procurement activity to pre-approved suppliers. This provides clear visibility of expenditure and supplier engagement and supports consistent application of our due diligence and monitoring controls. The system enables both proactive risk assessment and retrospective review where concerns are identified, allowing us to take proportionate action to manage modern slavery risks.

Due diligence

We carry out proportionate due diligence on all new suppliers before allowing them to become an approved supplier.

- ▶ As part of our supplier onboarding process, all new suppliers are required to confirm their understanding of, and commitment to comply with, the principles of the MSA, as applicable to their business and supply chains. This is achieved through the completion of a Modern Slavery questionnaire.
- ▶ For formal procurement exercises, we'll follow government best practice guidance, including where appropriate a risk based approach to identifying and managing modern slavery risk. Exclusion grounds will be applied in line with relevant procurement regulations where relevant. Enhanced due diligence may be undertaken for suppliers operating in higher risk service areas, labour models, or supply chains.

Our standard contract terms and conditions include provisions requiring suppliers to take appropriate steps to prevent slavery and human trafficking within their business and supply chains. Where concerns are identified, we may investigate further and take proportionate action, which may include requiring corrective action, placing additional safeguards on the contract, or terminating the contract where appropriate.

We undertake an annual review of supplier compliance with the MSA, with a focus on suppliers and categories of spend assessed as higher risk. On the anniversary of their onboarding, suppliers are required to complete a questionnaire to assess the actions they are taking to safeguard their business and supply chains from modern slavery risks. Any identified concerns or evidence of non-compliance are assessed on a case by case basis, and appropriate remedial action is taken to seek improvement and manage risk in line with our contractual and regulatory obligations.

Key performance indicators

During this financial year, we have not identified any concerns that slavery and/or human trafficking may be taking place within our business or supply chain. We continue to recognise that modern slavery is a risk within supply chains and remain focused on regular assessment and oversight to identify and manage any potential concerns.

Training and awareness

All colleagues receive training regarding the risks of modern slavery as part of our annual mandatory safeguarding training which includes human trafficking. New starters receive this as part of their onboarding and induction training, it is then refreshed on an annual basis. The training sets out how to identify at risk groups, signs of exploitation and how to report concerns, with the 'how to report' section having been strengthened to make this clearer. We also raise awareness of modern slavery issues by circulating information to our colleagues around the basic principles of MSA.

We have an in-house Equity, Diversity and Inclusion specialist who supports our people team and leadership in delivering training based on current legal guidance and industry best practice, facilitates awareness sessions, and updates toolkits.

We are committed to creating an environment of openness and trust, and support our colleagues to raise concerns where these arise.

Approval

This statement was approved by Accent Group Limited Board on 23 July 2026.

Signed by: 
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Nigel Wright
Chair

Accent Group
Limited