

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1 APRIL 2025 - 31 MARCH 2026

We are pleased to be publishing Onward's ninth Modern Slavery and Human Trafficking Statement covering April 2025 – March 2026.

Onward is committed to preventing slavery and human trafficking within our business and our neighbourhoods. This Statement sets out the steps we take to prevent modern slavery and human trafficking in our business, in compliance with the requirements of the Modern Slavery Act (2015).

ORGANISATIONAL STRUCTURE

Onward is a leading provider of quality, affordable homes for rent and sale in the North West of England. We own and manage over 30,000 homes across the region. But we do more than just provide a roof over our customers' heads. Our vision is to make a positive difference in the communities we serve. We offer help and support to vulnerable people facing a range of challenges and create strong and vibrant communities that our customers can be proud to be a part of.

The Onward Group is made up of:

- Onward Group Limited is the parent company for all entities within the Group. It is a Co-operative and Community Benefit Society
- Onward Homes Limited is a charitable subsidiary of Onward Group and is the main entity within the Group providing housing services. It is a Co-operative and Community Benefit Society
- Onward Build Limited is a commercial subsidiary of Onward Homes, set up for the purpose of VAT savings and to undertake some development activities.
- Onward Repairs Limited is a subsidiary of Onward Group – this company provides repair and maintenance services to the Onward Group.
- Contour Property Services Limited is a subsidiary of Onward Group – this company provides services to leaseholders within the Onward Group.
- Atrium City Living Limited is a subsidiary of Onward Homes – this is an investment subsidiary holding the investments in: GMJV Fundco LLP (a joint venture to invest in new build homes in Greater Manchester) and CRDP Developments LLP (a joint venture with Seddon RDP to develop 93 homes in Preston).

RISK ASSESSMENT AND MANAGEMENT

Managing the risk of modern slavery within our business is key to upholding our values. Our risk assessment and management activities focus on:

- Assessing our supply chain and ensuring our suppliers have robust processes in place to manage the risk of modern slavery.
- Ensuring our HR processes confirm that our colleagues have the right to work in the UK. In addition, we assess our gender pay gap and as a business we are committed and accredited to paying the Real Living Wage.
- Training our colleagues to ensure they have the skills to identify any examples of modern slavery within the communities in which we work.
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SUPPLY CHAINS

Onward are required to take a risk based and proportionate approach to modern slavery within our procurement chain based on assessment of risks including location, industry type and business models.

We do not have any direct supply chain links outside of the UK and our Procurement Policy sets out our expectations that all organisations we work with are committed to preventing slavery and human trafficking. Our supplier due diligence includes:

- All suppliers are required to complete a questionnaire around compliance with the Modern Slavery Act as part of the tender process. If the supplier cannot demonstrate compliance they automatically fail.
- We raise awareness of Modern Slavery with our procurement consortia and contractors.
- Our Modern Slavery Statement is accessible on our electronic tendering platform for potential suppliers to view.
- We conduct an annual assessment of suppliers to confirm they still meet our requirements.
- A significant proportion of our procurement is undertaken using procurement frameworks, who robustly assess adherence to modern slavery principals within the procurement chain.

COLLEAGUES

We believe there is a low risk of slavery or human trafficking within our workforce; our terms of employment are reviewed regularly to ensure we comply with all relevant legislation.

Onward uses only specified, reputable employment agencies to support any source of labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Recruitment agencies must be on our preferred suppliers list and be given prior authorisation before commencing work on a vacancy.

We continue to hold Real Living Wage accreditation, ensuring that contractors we work with comply with the requirements of this accreditation all colleagues are required to complete Modern Slavery training and comprehensive equality, diversity and inclusion training to ensure ongoing effective people practices, contributing to the Equity Approach 2025-2030. We monitor how many colleagues have completed the training and reminders are sent to those who have not completed the training, and their manager is informed that they are not compliant.

SAFEGUARDING CUSTOMERS

Due to the sector we operate in, some of our customers are vulnerable to modern slavery and we take seriously our part in keeping customers safe.

Modern Slavery awareness is supported by our Safeguarding HUB, who monitor and report all safeguarding referrals to Board annually. Expectations for colleagues and contractors regarding identifying and reporting safeguarding, domestic abuse and modern slavery concerns are provided in:

- Onboarding and subsequent annual training modules on Modern Slavery and Human Trafficking, Safeguarding Adults and Safeguarding Children.
- Be Vigilant procedures
- Contractor handbook

Awareness of safeguarding issues such as Modern Slavery is improving within our business, evidenced by the increasing number of cases our colleagues are reporting.

RELATED POLICIES AND PROCEDURES

Onward operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Speak Up Policy** - Onward encourages all of its colleagues and partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Onward's Speak Up procedure is designed to make it easy for workers to make disclosures, without fear of retaliation, and includes the option to raise concerns with colleague representatives.
- **Code of Conduct**- Onward's Code makes clear to employees the actions and behaviour expected of them when representing the organisation. Onward strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Procurement Policy** - Onward is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- **Recruitment & Selection Policy** - All recruitment to Onward is undertaken with a fair, transparent and robust recruitment process. All new starters to Onward are checked to ensure compliance with the latest government right to work checks.
- **Safeguarding Policies (Adult and Child)** - Onward is committed to reporting safeguarding concerns to Local Authorities and Police to help prevent serious crimes such as slavery and human trafficking to ensure proportionate, timely, professional and ethical responses to keep customers and tenants safe from harm and prevent abuse or neglect.

GOVERNANCE AND COMPLIANCE

We have not identified any breaches of the Act in the financial year 2025/26.

Responsibility for this statement rests with the Common Board of Onward Group and Onward Homes. This statement was approved by the Board on 9 September 2026

Onward's Chair: Tim Johnston

Signed:



Date: 10 September 2026