



Anti-Modern Slavery Statement

2025/26

Our anti-slavery and human trafficking statement reflects our commitment to acting ethically and with integrity in all our business relationships.

This Statement sets out A2Dominion's commitment to recognising and preventing slavery and human trafficking 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. This Statement covers our current position on modern slavery and activities undertaken during the financial year 2025/26 and future plans for 2026/27.

Policies

All our policies are reviewed on a regular basis to ensure that they reflect anti-slavery and human trafficking best practice and to mitigate against risks. Relevant key policies include, but are not limited to:

- Anti-Fraud, Bribery and Corruption Policy
- Anti-Money Laundering Policy
- Code of Conduct
- Procurement Procedure
- Recruitment
- Safeguarding Adults
- Safeguarding Children
- Whistleblowing.

This year, we have separated our Anti-Financial Crime Policy and introduced two separate policies 1) Anti-Fraud Bribery and Corruption Policy and 2) the Anti-Money Laundering policy. This was to make the policies more user friendly and to ensure that each legal framework is addressed clearly and in sufficient depth.

We have also introduced our new Everyday Expectations. This document sets out the essential standards that underpin a professional, safe and supportive culture. It translates our values into clear expectations for how we treat residents, support one another, and uphold safety, compliance and professionalism in every interaction.

Alongside this, A2Dominion adopts the National Housing Federation (NHF) Code of Conduct, which focuses on governance and accountability.

This year, we have also relaunched our revised Whistleblowing policy and introduced a dedicated email address where colleagues can raise concerns confidentially.

People

The Group's Recruitment Policy contains relevant requirements in terms of checking eligibility to work in the UK and carrying out necessary checks such as DBS (Disclosure and Barring Service) checks.

We are committed to ensuring that our employees and workers are not subject to any form of servitude, forced, compulsory, or bonded labour. Employees will have the freedom to leave freely and without threat to themselves or their family.

All our employees will be treated fairly and equally. We regularly review all our terms of employment to ensure that they comply with all relevant legislation.

As an employer we are committed to paying the national living wage as a minimum. Employees are provided with clear and transparent information about rates of pay, hours worked, and legal deductions.

Training

Safeguarding, slavery and human trafficking training is mandatory for all colleagues and board members (a new starter requirement). The training supports awareness and ensures staff and teams conduct business that is consistent with our statement and safeguarding strategy.

Supply Chain and Procurement

A2Dominion procures services and products directly and through our partnerships and contractual relationships with other suppliers and agencies. These are sourced from the UK, Europe, and beyond. A2Dominion does not wish to support or deal with any business that is knowingly involved in slavery or human trafficking in any part of its operations.

To that extent, A2Dominion includes within its tender documentation, a requirement for potential suppliers to provide a statement of assurance regarding its procedures and practices around modern slavery. In addition, we check for compliance with the Modern Slavery Act in our procurement supplier questionnaire when going out to market via tender.

When onboarding suppliers, we ask them to comply with the Standard Terms for Purchasing Goods & Services. We have included a section regarding compliance with section 54 of the Modern Slavery Act 2015 on our New Supplier Registration form.

Construction

In previous years, construction was identified as an area of high risk for A2Dominion.

- A2Dominion are no longer carrying out any direct-build construction activity therefore the risk of modern-day slavery has been reduced significantly.
- In any case, for any contractors procured in the future via the A2D contractor framework, the 'rights to work' and 'modern slavery statement' requirements are included within the pre-qualification questionnaire

New supplier requirements:

- Large contracts (above Public Contracts Regs threshold): process complete, as the pre-qualification stage gives us the right to reject companies without a modern-day slavery statement
- Smaller contracts: we ask companies to supply either proof of compliance with section 54 of the Modern Slavery Act 2015 (if the act applies to them) or what safeguards they have in place. Smaller companies (those with turnover of less than £36m) are not required to comply with section 54 of the modern-day slavery act so we do not have this assurance and need to manage on a case-by-case basis.

Terms and conditions and code of conduct:

- A2Dominion's standard terms and conditions explicitly include an obligation on our suppliers to comply with the 2015 Modern Slavery Act. These terms and conditions are on the A2Dominion external website.

Safeguarding

A2Dominions Safeguarding Adults Policy and Safeguarding Children Policy includes specific references to modern day slavery and as well as indicators of abuse.

Any incidents of modern-day slavery are logged by the Safeguarding team and investigated and reported accordingly.

Monitoring Effectiveness

Whilst a wider range of performance indicators will be considered in the future, the main method of monitoring effectiveness within the supply chain will be the pre-qualification criteria for suppliers, which includes a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain. Whether or not an organisation publishes its modern slavery statement is a standard question asked in our onboarding process as part of due diligence before any supplier is set up.

Completion of mandatory training is monitored and processes are in place to identify and address instances in which staff and board/committee members have failed to complete.

Governance

Responsibility for compliance with the Modern-Day Slavery Act lies with our Governance, People and Remuneration Committee and Group Board. The Chief Executive Officer is responsible for the annual anti-modern day slavery statement.

Future Plans

In 2026/27, we will review and update our action plan to enhance our compliance, in line with government guidance¹, structured around the following:

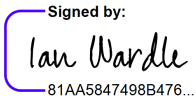
1. Organisation structure and supply chains
 - Refresh modern slavery risk assessment, with focus on priority areas (e.g. outsourced services, agency labour, supported housing)
 - Embed modern slavery risks within operational departmental risk registers
 - The Procurement team are looking to introduce a Code of Conduct into future tenders.
2. Policies in relation to modern day slavery
 - Continue to review and update policies linked to modern day slavery
3. Due diligence processes
 - We plan to review and strengthen our supplier onboarding process. The Procurement team are currently undergoing a due diligence consultation.
4. Risk assessment and management
 - Refresh roles and responsibilities across high-risk areas (Procurement, Housing Services, Property Services and Specialist Housing)
 - Introduce regular reporting to EMT/Board on modern slavery KPIs and risk.
5. Training and Awareness
 - Raise awareness to all colleagues (e.g. intranet content, training)
6. Reinforce a Speak-Up Culture
 - Reinforce links between modern slavery and existing safeguarding and whistleblowing processes
 - Ensure clear guidance for staff on recognising and reporting concerns

¹ <https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement#what-to-include-in-a-modern-slavery-statement>

Declaration

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's slavery and human trafficking statement for the financial year ending 31st March 2026.

This statement is reviewed and updated on an annual basis and has been approved by A2Dominion's Group Board. It applies to A2Dominion Housing Group Ltd and its relevant subsidiaries.

Signed by:

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Ian Wardle
Chief Executive

29/9/2026 | 12:29 BST