

Modern Slavery Statement 2025/26

Introduction

This Statement sets out Riverside'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 (MSA) and minimise the risks of any association with practices which undermine the principles of safety and dignity for our customers and staff, particularly with respect to people from most at risk groups.

The most at risk groups in the UK include migrant workers, illegal migrants, asylum seekers and individuals, such as homeless people, people with learning disabilities and young people. We continue to investigate and monitor how modern slavery and human trafficking may affect customers, staff and our business and supply chains and ensure that we respond effectively through our policies and our actions.

This Statement covers our current position on modern slavery and activities undertaken during the financial year 2025/26. The Statement applies to the whole Riverside Group, and all parts of the Group are expected to minimise the risks of slavery and human trafficking in their business and supply chains.

Organisation Structure and Business

Riverside is one of the largest charitable housing association groups in the country, owning and managing over 76,000 homes in England and Scotland for a diverse range of customers, giving a choice of housing for social and affordable rent, low-cost home ownership and outright sale.

With a substantial national profile and almost 100 years of experience, we work in some of the country's most challenging neighbourhoods. Our large, supported housing and retirement living business, Riverside Care and Support, provides high quality support to more than 15,500 service users, with a diverse range of housing needs.

The Riverside Group Limited (TRGL), our Group parent, is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014; it is also

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a registered provider of social housing with the Regulator of Social Housing. Within our group structure, there are a number of subsidiaries including Irvine Housing Association Limited, Prospect (GB) Limited, Evolve Facility Services Limited (transferred engagements into TRGL on 31 March 2026) and Riverside Estuary Limited.

TRGL (excluding Evolve, relief workers, volunteers, contractors and board members) employ 3,795 employees of whom 100% have the right to work in the UK (working full and part time).

Riverside's approach to being a responsible business sees us:

- Responsibly managing our supply chain
- Treating customers and suppliers fairly and with respect
- Allaying ethical procurement with value for money

Due Diligence

We have taken time to understand the implications of the MSA and identify the areas within our business and supply chain where the greatest risk exists. These are:

- Procurement – modern slavery can occur in a supply chain through inadequate or inappropriate procurement practices. Our supply chain consists mainly of services rather than goods, with the highest risk areas being associated with our building and maintenance activity.
- Supporting at risk customers within Riverside, whether they be General Needs or Care and Support customers - we may also come across slavery and/or human trafficking in connection with the vulnerable people we support, in particular those from minority or socially excluded groups who may be subject to forced labour and/or domestic servitude, and potentially in connection with our workforce. Accommodation provided by the Group could also be a potential venue for modern slavery.

We have identified the main risks in respect of these key areas and put measures in place to mitigate them. These include:



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- Mandatory training for every employee explaining the implications of the MSA and what they should do to recognise and report potential incidences.
- Screening our procurement documentation to ensure that adequate safeguards are in place at each stage in the process i.e. soft market testing, pre-qualification questionnaires and formal tender. Our documentation already reflects our commitment to being a responsible business by incorporating requirements on social value. We have now extended this practice to all new suppliers irrespective of whether they have been through a formal procurement process or not.
- Ensuring both Riverside and any preferred supplier employment agencies we use have the correct checks and balances within recruitment systems, such as eligibility to work in the UK and Disclosure and Barring Service (DBS) or Disclosure Scotland checks.
- We recognise that criminal exploitation, including cuckooing and other forms of coercion, represents a risk within housing and supported living environments. Our approach therefore integrates safeguarding, tenancy management and partnership working to identify and mitigate these risks effectively.

Supply Chain & Procurement

We do not have any direct supply chain outside the United Kingdom.

We are increasingly moving to a centralised supply chain using a ‘purchase to pay’ system, which requires the use of pre-approved suppliers. This means that there are more rigorous controls in place prior to expenditure being committed as well as improved visibility for retrospective checks.

We have taken steps to satisfy ourselves that the supply chain for relevant subsidiaries is satisfactory in terms of the requirements of both the MSA, as well as meeting any formal requirements we set out for our suppliers.

Our Group Procurement Policy is designed to ensure that all business units, subsidiaries and commercial entities owned and controlled by The Riverside Group operate in a legal, ethical and inclusive manner whilst achieving best value for money. This includes enabling our procurement activity to generate social and environmental, as well as commercial benefits. It was last reviewed in February 2025 and is in line with the Procurement Act. This includes for a strengthening of



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the approach to excluding suppliers where there is clear evidence of their involvement in Modern Slavery practices (disbarment list). The policy also includes a Statement on modern slavery, along with how to be a responsible business (social value) and sustainability.

Safeguarding

Riverside's Safeguarding Policies (covering Adults and Children – referred to as Child Protection in Scotland) include reference to modern slavery as a type or pattern of behaviour which constitutes abuse of a person at risk. We also require all Riverside employees (including Evolve) to complete training on safeguarding adults and children. A guide to the MSA is available to all employees on the safeguarding pages of Riverside's intranet, alongside the safeguarding policies and procedures.

Riverside have a planned programme of communication around Safeguarding which includes Modern Slavery with a number of internal bulletins being sent out to all staff to raise awareness. We continue to send regular bulletins on Human Trafficking and Modern Slavery to ensure all staff remain alert to the signs and understand how to report any concerns appropriately.

The Crime and Policing Act 2026 has made 'Cuckooing' an offence: 'Cuckooing' refers to the exercise of control over another person's dwelling without their consent for the purpose of criminal activity. This form of exploitation disproportionately affects vulnerable individuals, including those with support needs or experiencing homelessness. This activity was previously addressed through a range of offences, including modern slavery legislation, but is now recognised as a standalone offence, giving the Police additional legal powers to tackle cuckooing and provide additional support to victims. This strengthens the legal framework for tackling criminal exploitation in residential settings and aligns directly with risks identified within Riverside's services. The introduction of this offence provides greater clarity for enforcement agencies and supports improved identification and protection of victims. TRGL has a Safeguarding Working Group which will review the implications of the new legislation following publication of national guidance, with any required updates to Safeguarding Policies, Procedures, and staff training incorporated during 2026/27.



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Riverside is strengthening its approach to identifying and responding to criminal exploitation, including cuckooing, through enhanced staff awareness, clear reporting routes, and partnership working with safeguarding and law enforcement agencies. This ensures that emerging risks linked to exploitation are consistently recognised and acted upon across our services.

People

Riverside is committed to dignity at work and fair treatment of all colleagues. The following policies support our commitment to protecting and respecting human rights and an inclusive and supportive working environment, and ensure we are conducting business in an ethical and transparent manner:

- Whistleblowing Policy
- Code of Conduct
- Dignity at Work Policy

Recruitment

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

Training

Our learning management system, People Hub Learning has an eLearning module which covers modern slavery and human trafficking and is a mandatory requirement for all new starters to Riverside.

Following completion of the module, every Riverside colleague will:

- Define and explain the meanings of adult and child trafficking, human exploitation and modern slavery.
- Be aware of and make sure to respect the rights of victims of human trafficking.

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- Act in line with your own responsibilities as a professional and be aware of the responsibilities of other authorities in the UK.

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.

We will also monitor our supply chain using Dunn and Bradstreet. This system allows us to check a supplier's financial viability, credit rating, risk of failure, company overview and names of directors. This facility is particularly to allow us to monitor our supply chain appropriately.

We are currently using SafeContractor who carry out legislative checks around Equality and Diversity issues. We may consider the option of employing an external auditor to do audits on our suppliers in relation to modern slavery. Elements of contract management which are built into performance dashboards are mindful of not creating environments where modern slavery (particularly in the shape of bonded labour) may become a way a supplier or production site tries to deal with unrealistic short time pressure and related expectations on their operations or supplying partnership.

Ongoing frequent monitoring of employee relations cases ensure concerns regarding potentially vulnerable colleagues or circumstances are escalated accordingly. Employee relations cases are monitored and reported on monthly.

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

Governance

Responsibility for compliance with the MSA rests at the highest level with our Group Board and across the whole Leadership Team, with responsibility for the

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Statement assigned to the Chief Strategy and Corporate Services Officer. Specific responsibilities have been assigned to the heads of services which are identified as key risk areas:

- Supply chain
- Vulnerable clients
- People Services

The Government has introduced new measures to strengthen the Modern Slavery Act 2015 and ensure that large businesses and public bodies tackle modern slavery risks in supply chains. Organisations are encouraged to publish their modern slavery statements on the Government's modern slavery statement registry as part of good practice in transparency. Riverside publishes its modern slavery statement on the Government registry and on its website in line with best practice expectations.



Paul Dolan

Group Chief Executive

On behalf of the Board who approved this statement on 9 July 2026.