

Modern Slavery Transparency Statement

Pinnacle Group



Introduction

The purpose of this statement is to confirm that Pinnacle Group Ltd and other relevant group companies¹ (“Pinnacle”) have taken appropriate steps during the year ending 31st March 2024 to ensure our continued compliance with the Modern Slavery Act 2015 (the “Act”). As a business we are committed to providing employment opportunities which are non-discriminatory, support living wage legislation, and offer regular hours and working conditions that are safe and hygienic. We are also committed to implementing and enforcing effective systems and controls to ensure that there is no modern slavery or human trafficking taking place anywhere in our own business or in any of our supply chains.

[1] This statement covers all subsidiaries of the group, but particularly Pinnacle Group Ltd, Pinnacle Housing Ltd and Pinnacle FM Ltd who each fall within the scope of section 54(2) of the Modern Slavery Act 2015.

Our Group

Pinnacle is a community-facing, people-first business that delivers, manages and maintains communities and places where people live, learn, work & play. This includes a portfolio of 70,000+ homes across all living sectors, 160+ schools as well as open spaces, public and private buildings, retail, distribution centres and manufacturing plants.

We also provide integrated neighbourhood services to over 300,000 homes and deliver more than 1 million hours of security and concierge services each year.

Our business operates across public and private sectors, and we now directly employ over 3,800 people of more than 70 different nationalities, operating from over 200 locations across the UK. Our service infrastructure allows us to “localise” service delivery and be a part of the communities we serve.

Further business information can be found at: www.pinnaclegroup.co.uk.

Pinnacle is heavily reliant on its people and supply chains in the delivery of services. We are also aware of our diverse customer base with a wide range of backgrounds and needs. Each business within the group is responsible for ensuring that they can demonstrate compliance with the Act by working to our Code of Conduct and Group policies and procedures.

Due diligence across our business and supply chain

Our business in relation to slavery and human trafficking

Pinnacle has a reputation for and prides itself on being a moral and principled employer. We believe this provides a platform to deliver a more consistent service and quality across our contracts and sends out a message that we care about the wellbeing of the people working for us.

We support living wage requirements and regularly review our terms of employment to ensure that they comply with all relevant legislation. During the year, we became accredited as a Recognised Service Provider by the Living Wage Foundation.

All staff employed by Pinnacle have identity and Right to Work checks, employment reference checks, and where applicable Disclosure and Barring Service (DBS) checks prior to employment commencing. These checks are always carried out in line with the relevant legislation and in accordance with UK Government guidance. For certain roles, where additional background checks are required, a more in-depth vetting process is in place.

Our HR and Payroll system provides us excellent transparency in this area, through extensive DBS workflows and reporting to incorporate 3-yearly checks, significantly reducing any compliance risk.

We have an established Supply Chain Management System which has enhanced our ability to make quick decisions and bring on new suppliers safely, whilst supporting our management of essential supplies when required (for example, PPE and cleaning materials during the pandemic).

We are an accredited “Investor in People”, holding Silver status. The accreditation requires a rigorous internal and external assessment (the last being in early 2023) framework to ensure our policies, procedures, and the way we treat our staff sets a standard of a great employer, and an outstanding place to work.

Our annual “Your Voice” engagement survey asks staff to anonymously comment on their experience in the workplace and beyond. At the end of every section is a free text field allowing the opportunity to provide honest feedback or raise concerns. All staff are encouraged to complete the detailed questionnaire and are informed of the purpose. The data collected is used to identify areas of improvement and flag any issues. During the year, we also launched targeted surveys for onboarding and exiting staff.

Our supply chain in relation to slavery and human trafficking

We have zero tolerance to slavery and human trafficking. We expect our suppliers to work to the same high standards that we impose on ourselves. We actively promote safe and fair working conditions, including the responsible management of environmental and social issues within our supply chain.

Through our procurement processes we monitor our supply chain to ensure only reputable suppliers and contractors who share those same high standards and comply with our Supplier Code of Conduct and values remain on our preferred supplier list.

As part of our supplier onboarding process, all suppliers are required to complete various due diligence checks and return a signed copy of our Supplier Code of Conduct. We assess our supply chain for potential areas of risk of non-compliance with the Act, considering a number of factors including:

- Suppliers operating outside of the UK / EU regulatory framework;
- Raw materials that are produced, or likely to be produced, outside of the UK / EU; and
- Suppliers operating using temporary and/or low skilled labour.

Within our standard tender documents and commercial contracts, there is an obligation for suppliers to fully support and operate in accordance with the Act and take all reasonable steps to ensure that there is no modern slavery in its business or supply chain – Pinnacle reserve the right to terminate any supplier relationship where this obligation is not adhered to. We continue to identify suppliers that should have their own modern slavery policy – to date we have reviewed well over 100 such policies.

Our Supplier Code of Conduct (the “Code”) includes key modern slavery provisions (i.e. equal pay, working hours compliant with legislation etc.). The Code is integrated into our supplier on-boarding process, meaning

all new suppliers are required to review and confirm they will adhere to anti-slavery principles. At the time of writing, approximately 2,500 suppliers have been on-boarded and signed up to our Code.

We have also continued to roll out quarterly audits with our strategic suppliers where the management of environmental and social issues is addressed as an agenda item for discussion. This now forms part of a more detailed annual audit of major suppliers.

In the coming financial year, we will be introducing a new supply chain management CRM system where we will be able to flag suppliers that should have a modern slavery policy and/or publish an annual transparency statement and will be carrying out audits to check their policies are in place, robust, and fully implemented. We will also be exploring ways to boost awareness within our supply chain and monitor engagement.

Effectiveness in ensuring that slavery is not taking place

Pinnacle has a set of policies and procedures which in general cover human rights issues and are aimed at minimising the risk of slavery or human trafficking. Our policies are reviewed on an annual basis, or more regularly as required by any legislative change.

In addition to our Modern Slavery Policy, some of the policies and procedures of particular note are our Supplier's Code of Conduct, Equal Opportunities, Equality, Diversity and Inclusion, Recruitment and Selection, Grievance, Harassment and Discrimination, and Whistleblowing. These are all easily available on our intranet and upon request.

Our staff, customers and suppliers are actively encouraged to report any concerns or suspicions they have that any unlawful conduct, including slavery or human trafficking, is taking place at work. For our staff, we have a dedicated and confidential Report a Concern link on our intranet to facilitate this.

We also promote the Modern Slavery Helpline 0800 0121 700 (www.modernslaveryhelpline.org/), where individuals can report any suspicious activity or seek help and advice in confidence.

In an effort to combat the hidden nature of modern slavery and boost awareness of the signs, we now display posters and infographics created by the UK Home Office (part of the 'Modern slavery is closer than you think' briefing documents) in company offices, site depots and customer facing notice boards. Our regular internal communications provide links to a UK Home Office short film and other relevant information to further educate the business. Looking ahead, we will continue to broaden the accessibility of our resources such as providing information in different languages.

Staff training about slavery and human trafficking

Our policies are communicated to staff from the point of induction and regular updates are provided as required either through training programmes or Corporate Communications as the group see fit. All staff are signposted to our Core HR policies and Code of Conduct at induction.

Our policies and procedures are reviewed on an annual basis, or more frequently where legislation or regulation updates dictate, to ensure that they remain fit for purpose. Of particular relevance are our policies on safeguarding and vulnerability issues, mindful of our diverse customer base and workforce.

To boost awareness, we again marked this year's Anti-Slavery Day with a communications campaign addressing what is modern slavery and how to spot signs. The article also spotlighted our policies,

procedures and provided contact details in the event of an employee wanting to raise a concern. Over the next twelve months, we will continue to roll out training to our human resources, procurement, commercial and operational teams to increase their awareness of the Act and our associated due diligence processes. As part of induction training for new starters and refresher training for existing staff, staff are reminded of our core policies, including the Whistleblowing policy and who to contact with any concerns. The HR team conduct Right to Work checks in accordance with the applicable legislation.

We are developing an internal accessible training module open to all Pinnacle staff. Participation will be recorded so we can understand engagement per division and develop ways to reach a wider audience, including within our supply chain.

Modern Slavery Working Group

We launched the Modern Slavery Working Group (“MSWG”) in May 2021. The principal purpose of the MSWG is to support the ongoing development of responsible business practices in relation to modern slavery. The MSWG is tasked with developing guidance materials to improve key stakeholders’ awareness of modern slavery, monitor (and highlight any increased areas of) risk across Pinnacle, develop training and policy, and assist with supply chain audits.

The MSWG comprises representatives from across the business. This broad, non-exclusive membership is beneficial to promoting discussion at all levels and gaining different perspectives – vital to influencing real change.

Historically, various members of the MSWG and operational staff from our Homes division have attended an external certified training webinar provided by a prominent anti-slavery charity. We will continue to support attendance at this type of event.

Our Commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Pinnacle’s slavery and human trafficking statement for the financial year ending 31 March 2024 as approved by the Board of Directors.



Perry Lloyd

Group Chief Executive