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Modern Slavery and Human Trafficking Statement

Introduction

This statement highlights our (Fairhive Homes) approach to understanding all potential modern slavery risks related to our business in compliance with section 54 of the Modern Slavery Act 2015. This approach is aimed at ensuring that there is no slavery or human trafficking in our business and our supply chains. This statement relates to the financial year 1 April 2023 to 31 March 2024.

We operate solely in England and all of our first-tier suppliers are UK based. However, as we commission construction and refurbishment projects for our properties, we effectively operate in a 'high risk' sector. We are aware that the construction industry is more susceptible to modern slavery and human trafficking than many other sectors, even for those companies operating solely within the UK.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our infrastructure is free from slavery and human trafficking.

Supply Chain

We asked our significant construction related suppliers to review their survey responses provided to us in 2023 in order to continue to ensure there is no known modern slavery or human trafficking in the supply chain. Newly appointed suppliers have also been required to complete the same survey. A 96% response rate was received from our 72 suppliers. We have 3 missing suppliers who have all shared their modern slavery statements with us highlighting their total commitment to preventing slavery and human trafficking as their turnover is above £36 million. Of the 69 suppliers received, 21 suppliers are required to prepare their own transparency in supply chains statement.

No supplier had any reason to suspect there is slavery or trafficking in their supply chain. All suppliers have been asked to proactively notify us in the event that this situation changes. Many suppliers have specific anti-slavery and anti-trafficking policies in place. 39 of our suppliers are members of a construction industry federation. All suppliers confirmed they pay all their UK staff at least the national minimum wage and all suppliers with overseas branches confirmed they comply with the minimum wage legislation in the countries in which they operate. 53 of the suppliers ensure they check the identity of employees of sub-contractors from high risk countries including Slovakia, Romania, Poland, Lithuania and Hungary.

The responses to the questionnaire, combined with our knowledge and relationships with our suppliers, has satisfied us that there is no reason to believe that there is any slavery or human trafficking in our supply chain during this financial year. We are further satisfied that there are robust procedures in place to ensure that any occurrence of slavery or human trafficking will be identified by us or our suppliers.

Relevant Policies

We operate the following policies that support preventing slavery and human trafficking in our operations and supply chain:

- **Whistleblowing Policy** - we encourage all employees, customers and other business partners to report any concerns related to our direct activities, or supply chains. This

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includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Our whistle blowing policy is contained in an internal document (confidential reporting policy) and made available to all employees on our Intranet.

- **Employee Code of Conduct** - our code makes clear to employees the actions and behaviours expected of them when representing us. We strive to maintain the highest standards of employee conduct and ethical behaviour.
- **Supplier Code of Conduct** – our code makes clear to our suppliers the actions expected of them when partnering with us. It sets out that modern slavery and human trafficking must not exist in their business or supply chain.
- **Recruitment/Agency Workers Policy** - we use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency. All our employees have a written contract of employment and we carry out appropriate right to work and identity checks. We are also alert to any exploitation risk indicators such as a high number of people sharing the same address.
- **Safeguarding Policy** – our safeguarding policies and procedures are aimed specifically at people with care and support needs who may be in vulnerable circumstances. Modern slavery is one of the principal categories of abuse that is contained within the Safeguarding Policy and our plan to safeguard the welfare of our residents is set out in detail.

Awareness-raising Programme

We have raised awareness of modern slavery issues by informing all of our employees by using our Intranet service.

This information explains to employees:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties; and what external help is available, for example through the Modern Slavery Helpline
- We have also raised awareness of modern slavery issues at a senior level by providing training to our Board members.
- In 2020, we also launched our ‘County Lines’ eLearning module to help promote awareness about this growing national exploitation issue. ‘County Lines’ is where illegal drugs are transported from one area to another to expand a drugs network, often across police and local authority boundaries, usually by children or vulnerable people who are coerced and exploited into it by gangs.

Review

This statement will be reviewed and published annually.

This statement is approved by our Board and signed on its behalf by:

Signed by:
Stephen Stringer
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Stephen Stringer
Chair of Fairhive Homes Ltd