

# Keepmoat Limited- Modern Slavery and Human Trafficking Statement

## Introduction

Keepmoat is committed to operating ethically and with integrity, with zero tolerance for modern slavery, human trafficking, forced or child labour in all our business dealings and relationships.

This is the Keepmoat Modern Slavery and Human Trafficking Statement for the period 1st November 2023 – 31st October 2024 published in compliance with the Modern Slavery Act 2015 (the 'Act') within six months of our year end. This statement sets out the steps taken by Keepmoat and its group companies listed in the Appendix. against modern slavery.

## Responsibility

Our Chief Executive Officer, on behalf of the Board, has responsibility.

Our Group Production Director is the Executive Sponsor. The Supply Chain Director has operational responsibility in relation to Modern Slavery. Individual Group Functional and Regional Managing Directors are responsible for their local supplier relationships and compliance with the Act.

We have a dedicated working group that supports compliance with our Modern Slavery obligations and policies, which consists of the following representatives: General Counsel & Company Secretary, Director of Audit, Compliance Manager, Supply Chain Director, Sustainability Director, Head of HR Operations, Commercial Development Director and Group Finance Director.

## Organisation Structure and Supply Chains

Keepmoat is a large, established house builder with a track-record of delivering quality homes across the UK.

However, bricks and mortar are only one side of our corporate story. We are also a business that is committed to building communities and helping them thrive, improving local people's lives and job prospects and protecting the natural world.

We achieve this through a partnership house building model that brings together local authorities, landowners, registered providers, and local communities.

Keepmoat is made up of nine regional offices. These operate on a regional empowerment model, with key systems, processes and controls being set centrally.

We directly employ circa 1,085 employees.

Our Supply chain involves national and local companies. Each functional or regional team is responsible for sourcing and supplying goods and services to each of their development sites or functions. We maintain several strategic group supply chain agreements whose products or services are required to be used across our developments.

Keepmoat wishes to work with partners who share our commitment to preventing Modern Slavery. To ensure this happens we require our sub-contractors and suppliers to comply with all relevant laws in our contracts. We also survey members of our centrally procured supply chain to verify their knowledge of and adherence to the requirements of the Modern Slavery legislation.

We will engage with our subcontractors and suppliers to require that they improve their practices where concerns are identified.

## Policies, Training, and Guidance

We have a Modern Slavery Policy in place that reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems, processes, and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. It also sets out what action's individuals can take if they are concerned that slavery or human trafficking is taking place in our business or supply chain.

Our Modern Slavery Policy is complimented by: -

- ▶ **A framework of corporate policies** such as whistleblowing, anti-bribery and corruption, sustainability, and health and safety. Our policies are frequently reviewed.
- ▶ **Practical guidance** - for example Modern Slavery and Whistleblowing posters, available for display across all our developments and offices. These posters ask all colleagues and individuals to remain vigilant to the signs of modern slavery within our business and supply chain. We also undertake annual regional director spot checks on sites to check that practical guidance is displayed or routes to escalation are understood.
- ▶ **Escalation routes** - Colleagues, suppliers and sub-contractors who become aware of possible improper, unethical, or illegal behaviour are encouraged to raise the matter with their line

manager, General Counsel or use Safecall, our independent Whistleblowing service, which is available 24 hours a day, seven days a week and colleagues are aware.

Website	<a href="http://www.safecall.co.uk/report">www.safecall.co.uk/report</a>
Telephone Line	0800 915 1571

- ▶ **Training** – To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we mandate all our colleagues undertake e-learning training on a frequent basis. All colleagues are required to complete mandatory training.
- ▶ **Partnership** – We also partner with the Supply Chain Sustainability School to increase awareness and provide training resources for our supply chain colleagues. These materials have also been made available to group supply chain suppliers in our supply chain.

## Due Diligence and Risk Management

We regularly review our existing business and supply chain to identify key risk areas and level of risk in our operations and have frameworks in place to identify and manage such risks.

We also conduct periodic reviews of our internal policies and processes and continue to develop and supplement where appropriate, for example, desktop audit assessments with Achilles for our group procured materials suppliers.

As regards current due diligence, we undertake the following steps to mitigate against risks:

AREA	DUE DILIGENCE
Colleagues	Right to work checks
Temporary Workers	Right to work checks (by Retinue or other temporary agencies)
Sub-contractors	We require subcontractors to use the CHAS programme, which requires the upload of their Modern Slavery Policies to receive a CHAS compliance score. There are limited exceptions where sub-contractors do not use CHAS.  Go Contractor – identity checks
Materials Supply Chain	Evidence of their Modern Slavery Policy (or if they do not have a policy, they are contractually required to agree to adopt Keepmoat's policy)  Desktop audit of suppliers via Achilles

## Risk Assessment and Management

We base our risk assessment on: -

- ▶ low skilled labour – services or products.
- ▶ materials from high-risk countries.
- ▶ temporary/transient labour; supply and sub-contractor chain.

We have determined our overall Modern Slavery risk is low in our own operations and in our immediate group procured materials supply chain and sub-contractor base. We have also not had any instances of whistleblowing regarding Modern Slavery in the reporting year.

We manage our risk on the basis that we have implemented significant steps to promote overall awareness and due diligence regarding Modern Slavery across the business, including in our supply chain

and with our sub-contractors. This is supplemented by external service providers providing tools to carry out due diligence and risk assessments on our sub-contractors and supply chain.

## Key Performance Indicators

Keepmoat reviews its performance against preventing modern slavery on an annual basis. We use the various key performance indicators (KPIs) to measure how effective we have been in ensuring that Modern Slavery and human trafficking are not taking place in any part of our business or supply chain, key highlights to report against some of our KPI for FY24 are as follows:

KPI	FY24 KPI Performance
Group Material Suppliers	Moving towards Achilles Desktop Gold Standard for Group Material Suppliers
No. of Suspected MDS incidents	None
Colleagues due training and completed in FY24	100%
New colleagues trained within 6 months of starting	96%

We will continue to review progress regularly and report in our next statement against the above

**Date approved by Board:**

**Signed by:** 

### Appendix: Keepmoat Group

**Companies Keepmoat**

**Homes Limited**

**MCI Developments Limited**