

**Curo Group (Albion) Limited  
and all subsidiaries (including Curo Enterprise Limited)**

**Modern Slavery and Human Trafficking Statement 2025**

**Introduction**

This statement sets out our commitment to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are fully committed to conducting our business with the utmost ethical and moral standards and have implemented effective systems and controls to prevent any instances of slavery or human trafficking in our supply chains. Our Modern Slavery and Human Trafficking Statement underscores this commitment, and we do not engage with any business that is knowingly involved in slavery or human trafficking in any aspect of its operations. As an employer, we are dedicated to treating our employees fairly and ensuring that they are paid the Living Wage across England. We regularly review our terms of employment to ensure that they align with all relevant legislation.

**Organisational structure, business and responsibilities**

Curo is a housing association and housebuilder based in Bath, providing affordable homes and high-quality care and support services across the West of England. Our 800 colleagues provide services to more than 27,000 customers; we manage approx. 14,000 homes and are building hundreds of new homes every year.

Our Modern Slavery Statement applies to Curo ('the Group'), and its subsidiary companies as listed below:

- Curo Places Limited
- Curo Choice Limited
- Curo Market Rented Services Limited
- Mulberry Park Community Benefit Society
- Curo Finance Limited
- Curo Enterprise Limited

We are aware that we may also come across slavery and/or human trafficking in connection with the vulnerable people we support, especially those from minority or socially excluded groups who may be subject to forced labour and/or domestic servitude. Our homes could also be a potential base for modern slavery.

The Chief Governance Officer as Policy Owner, is accountable for the implementation of the Modern Slavery Policy. Our Combined Board and Executive, through the Policy Owner, ensure that the policy delivers Curo's strategic objectives and reflects corporate values.

**Procurement and Supply Chain**

Our supply chain consists mainly of works contractors and service providers, with the highest risk areas in relation to modern slavery being associated with our building and maintenance activity and communal services. We have a minimal supply chain outside the United Kingdom.

The Procurement Team and Commercial Team monitor relationships with contracted suppliers for Curo Group (including Curo Enterprise) and maintain a central Modern Slavery Register listing all Curo contracts and the obligations of each contracted supplier regarding modern slavery. Each supplier's Modern Slavery Statements are saved on our contract management systems. If a supplier does not have a Modern Slavery Statement, the supplier has the option to create a Modern Slavery Statement for the purposes of the contract or to agree to a Curo Modern Slavery Declaration. The Procurement team and the Curo Enterprise commercial team monitor live contracts to ensure modern slavery information is kept current.

All suppliers are asked to declare they are compliant with the Modern Slavery Act 2015 when they register on our supplier portal (excluding Curo Enterprise) and again when they bid for any tender. Further detail is requested from suppliers in relation to supply chains (as relevant) at tender stage. Curo Enterprise completes pre-qualification checks with suppliers and contractors, which include requirements to set out commitments to compliance with modern slavery.

Curo Group is a public sector organisation and is therefore subject to the requirements of the Procurement Act 2023 ('PA23'). As part of the Group, Curo Enterprise operates within the private sector and is not legally required to comply with PA23. However, Curo Enterprise closely follows the principles of PA23 and other relevant legislation and best practice, including Modern Slavery and UK-GDPR, where practicable. Our procurement and contract management activities are designed to reflect the high standards set across the Group, ensuring consistency, transparency, and ethical practice.

### **Our policies, procedures and due diligence**

We reviewed and updated our Modern Slavery Policy in 2024/25 to ensure that it remains effective and compliant with relevant legislation.

The other key policies which support our Modern Slavery Policy include specific policies on Safeguarding, Procurement, Whistle Blowing and Reportable Events.

We have implemented a range of measures to ensure that our operations and supply chains are free from any form of exploitation or forced labour. We have established a dedicated working group to oversee our approach to modern slavery, which includes regular reviews of our policies and procedures to ensure they remain effective and compliant with relevant legislation.

Curo recognises the importance of identifying and assessing the risks of modern slavery within its operations and supply chains. Curo has implemented a robust risk assessment process that involves a comprehensive review of its policies, procedures, and contractual obligations. Our risk register identifies potential risks of modern slavery, which is reviewed quarterly by the Audit and Assurance Committee and our Combined Board as part of our Assurance Report.

### **Training and implementation**

Our staff receive regular training on identifying and addressing instances of modern slavery, and we have established clear reporting channels to encourage the reporting of any concerns and suspicions. Curo Enterprise commercial and construction staff have received specific construction-based training on identifying

and addressing instances of modern slavery. Each construction site displays modern slavery information posters & information is highlighted within the site induction process.

Our induction programme includes a briefing about safeguarding, at which new colleagues are made aware of our policy and procedures. Safeguarding eLearning covers awareness of modern slavery and how to report suspected abuse. Colleagues must complete this training on an annual basis with 91% of colleagues having completed it.

Safeguarding is everyone's responsibility, which is why our Tenancy Compliance teams are partnering with the local council on their Community Safety and Safeguarding Partnership to protect children, adults, families and communities who most need our help.

We believe that our approach to addressing modern slavery is aligned with our values and our commitment to ethical and sustainable business practices. We are committed to continuously improving our performance in this area and to playing our part in the fight against modern slavery.

### **Continuous improvement**

We have re-established our Modern Slavery Working Group to retain oversight of our Modern Slavery Statement and our commitments. As part of this work have identified the following areas of continuous improvement:

- Recognition of the Procurement Act 2023 which came into force in February 2025 and the changes and reporting requirements this brought about. We will ensure that we adhere to and remain compliant with this Act.
- We continue to work to ensure that our tenants and customers are supported and safeguarded appropriately through working closely with organisations and charities across B&NES and with Avon and Somerset Police. We will, through these relationships, continue to promote good practice with regards to modern slavery.
- Our Audit and Assurance Committee provide continuous scrutiny of our risks and processes through our Annual Report on Internal Controls.

*This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's Modern Slavery and Human Trafficking Statement for the financial year 1 April 2024 to 31 March 2025.*

*This statement was approved by the Combined Board for all Curo Group companies (including Curo Enterprise Limited) on 2 June 2025.*



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Victor da Cunha  
Chief Executive