

Modern Slavery & Human Trafficking Statement

Introduction

We support the objectives of the Modern Slavery Act 2015 and are committed to acting ethically and with integrity in all our business dealings and relationships. We aim to ensure that modern slavery, human trafficking or forced labour is not taking place anywhere in our business or in any of our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we expect the same high standards from all our contractors, suppliers and business partners.

Our structure

We are a regional house builder with a single Support Office based in Doncaster, South Yorkshire. All our operating sites are within Yorkshire, The Midlands, and the North East.

Our main business activities are acquiring land for development, building homes of a high-quality, whilst offering an outstanding service to our customers and clients.

We develop homes for a combination of private sale customers, presold partnership clients, and housing associations.

We directly employ approximately 200 people, and are committed to fair employment practices, following where applicable all employment laws, and we also invest in supporting the health and wellbeing of our team.

Our supply chain (contractors & subcontractors)

Our supply chain include building contractors, sub-contractors, and professional consultants e.g architects and land surveyors.

We have a stable supply chain allowing us to benefit from a significant number of long standing trading relationships with likeminded Subcontractors, Suppliers and Consultants who share our values. Honesty and transparency are the basis of these relationships.

A number of our suppliers will be of a size that trigger a requirement to comply with the obligation to produce a Slavery and Human Trafficking Statement under the Act.

Whilst construction of our homes is not the only area of our business that carries the risk of modern slavery, we have identified this as a major risk area and is therefore our primary focus.

A home includes a large number of different materials. Some are sourced in the United Kingdom but many are either not available or not commercially available in the United Kingdom. This

means our supply chain is geographically diverse and occasionally includes some countries where there is a risk of modern slavery and child labour.

Our subcontractors provide their own labour force to work on Strata sites. We have identified this as another area of risk.

We also engage with subcontractors responsible for supply and fit contracts. This is another area of risk identified due to the subcontractor sourcing the materials on our behalf.

When onboarding new contractors and subcontractors, they undergo a robust onboarding process which includes checking and recording their most recent modern slavery statement's and relevant policies to ensure compliance. This is then checked annually for our supply chain as part of our auditing process to ensure compliance on an ongoing basis.

Our suppliers (products & services)

We source some building materials directly from suppliers, and other materials used in building our homes are procured by the contractors engaged to carry out the building works. This means we are often several steps removed from the procurement of materials, and we acknowledge this can therefore increase the risk.

We also work with many suppliers that provide us with professional services and outsourced support such as lawyers, accountants and other consultants.

We ensure that when engaging with new consultants, we obtain their modern slavery statements and relevant policies and keep them on file. This is then checked annually for our supply chain as part of our auditing process to ensure compliance on an ongoing basis.

Steps taken during 2023

1. Developed and published a sustainable procurement policy and outlined the expectations and processes to ensure compliance with the policy.
2. Reviewed and updated our action plan, outlining what action is needed, with target dates for completion, which we will review on an ongoing basis.
3. All directly employed team members continue to receive regular training in relation to modern slavery.
4. Reviewed our induction process to ensure the training we provide is relevant and up to date.

Commitments for the coming year

We are committed to increasing our understanding of the risks of modern slavery, human trafficking and child labour in our business and our supply chains, and to their eradication if found by undertaking the following actions in the coming year:

1. Continue the implementation of our sustainable procurement policy.
2. Working towards all individuals working on our sites having ID Cards (CSCS) on site to confirm their identity.

3. Continue with our audit process when both onboarding new contractors and subcontracts and suppliers by collecting modern slavery statements and any relevant policies for companies that meet the criteria and have to comply.
4. Communicate our process for raising concerns or suspicions to all individuals on our sites.
5. Communicate free training to our suppliers and supply chain to upskill and support, especially to those who are not required to provide a statement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30th June 2024.

This statement cover the following subsidiary companies:

Strata Homes Limited

Strata Homes Yorkshire Limited

Strata Homes Midlands Limited

Ignite Homes Limited

Strata Plus Limited

Signed:



Name:

Gemma Smith

Role:

CEO

Date:

03/09/2024