

Peabody Group - Modern Slavery and Human Trafficking Statement 2026

As a responsible employer and business, and as an organisation dedicated to improving the lives of our residents and the communities we serve, Peabody Group is committed to doing everything we can to prevent modern slavery and human trafficking. This statement sets out how we deliver that commitment, understanding and mitigating the risks of modern slavery or human trafficking taking place within our business or supply chain, and demonstrating compliance with the Modern Slavery Act 2015. It is intended to provide our stakeholders with information to make an informed choice about their dealings with us.

1. Organisational Structure, Our Business and Supply Chains

Peabody was established in 1862 by the American banker and philanthropist, George Peabody. We are one of the oldest and largest housing associations in the UK. Today, Peabody Group, which operates exclusively within the UK, is responsible for 109,000 homes and 220,000 residents across London and the South East. We also have 25,000 care and support customers.

Regulated by the Regulator of Social Housing, Peabody Group provides quality homes and works with communities to strengthen neighbourhoods and support people when they need it most.

Peabody Trust is a community benefit society and the parent entity of Peabody Group. It has approximately 50 subsidiaries of various tiers, which between them carry out the full range of activities undertaken across the Group. This statement has been prepared to cover the activities of Peabody Trust and its subsidiaries, including Town and Country Housing (TCH), Peabody Developments Limited, Peabody Construction Limited and Catalyst By Design Limited, as well as other subsidiaries of Peabody Trust, as set out on Peabody's website.

2. Organisational Policies

Peabody Group has strategies, policies and procedures in place which help prevent and detect modern slavery and human trafficking. These cover our workforce, our supply chain, and our residents as well as the wider communities we work with across London and the South East.

They include:

- a Recruitment Policy which includes requirements for all new employees to provide verified identity documents (such as a passport) before their start date to verify their legal right to work in the UK;
- paying the Real Living Wage as a minimum to all Peabody Group employees and encouraging colleagues not to work more than the number of hours permitted by law;
- policies on Equality, Diversity and Inclusion, Safeguarding Children, Safeguarding Adults, Domestic Abuse and Violence Against Women and Girls, including specialist training and support for front-line employees;
- the requirement that all Peabody Group employees and contractors adopting our terms and conditions adhere to our Code of Conduct and related policies, which include

provisions against bribery, and requirements in relation to workplace behaviour and equality and diversity;

- TCH currently has its own Contractor Code of Conduct, which states “We do not tolerate forced, debt bonded, indentured labour practices or human trafficking. TCH does not allow harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. We expect our suppliers and others to meet these expectations”. The Contractor Code of Conduct also provides that “forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used”;
- a Social Value Policy which delivers a cohesive approach for optimising social value (with a 20% weighting for social value now standard policy in all above threshold tenders) throughout all our commissioning and purchasing activity. This supports the United Nation’s Sustainable Development Goals detailed in the ‘2030 Agenda for Sustainable Development’ and adopted by all United Nation Member States in 2015. This is monitored and reported on according to outcomes provided by the UK Social Value Bank, via the HACT Social Value Insight tool. Social value delivery supports a broad remit of our community investment, care, inclusion and harm reduction work ¹; and
- a Whistleblowing Policy which protects employees and contractors from negative repercussions if they make a report in good faith about an apparent breach of law or our Code of Conduct (where applicable), and requires that all such reports will be properly investigated and acted upon, as necessary. Our policy makes it easier for anyone with concerns to provide us with information, with confidence that we will take it seriously and treat it confidentially.

Peabody Group regularly reviews its policies, procedures and practices to make sure they are compliant with the law and in line with organisational needs and best practice. Our Code of Conduct and related policies, together with the TCH Contractor Code of Conduct, are designed to assist employees and others working with Peabody Group to understand their responsibilities and obligations and provide guidance on expected behaviour in the workplace.

As a housing association and organisation active in community work across London and the South East, Peabody Group is well placed to identify potential signs of modern slavery and human trafficking, and as such we place value on the training our front-line employees receive to help them spot issues when going into homes and meeting residents.

Peabody Group has zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees or Board Members, or their families or close associates.

¹ TCH adopts the Social Value Policy and is continuing its work to develop its social value approach in broad alignment with that of the wider Peabody Group, as appropriate to the needs of its geographical area and residents.

3. Assessing and Managing Risk

In February 2025, Peabody Group became the first housing association to be awarded the respected Good Business Charter accreditation. We were reaccredited in February 2026, underscoring what is our continued commitment to ethical business practices and social responsibility. The Good Business Charter is an independent UK-based certification recognising responsible business behaviour across ten key areas, including employee wellbeing, diversity and inclusion, environmental responsibility, and commitment to customers. To earn the accreditation, Peabody Group was required to demonstrate our performance in all ten areas - showing we operate with integrity, fairness and respect for all stakeholders, including employees, residents, suppliers and the environment.

The Good Business Charter also obliges Peabody Group to include adherence to the Ethical Trading Initiative Base Code in our standard supply contract terms and conditions.

When procuring third-party suppliers, Peabody Group is governed by the Procurement Act 2023, which includes compliance within the selection process for above-threshold procurements. These obligations are placed on the lead supplier and their respective supply chain partners. Any failure to meet this requirement will lead to the disqualification of the applicant. For below-threshold contracts or agreements, clauses are included within Peabody Group's standard terms and conditions seeking assurance from suppliers that they comply.

Peabody's Procurement Policy and Procedures requires all suppliers with a spend above £30,000 per annum to register with our Supply Chain Compliance scheme which continually assesses our supply chain, providing visibility of a suppliers' stance / policies and alerting us when they expire or do not meet the relevant standards. This approach supports our Contract Management Framework which requires all colleagues to monitor compliance with the requirements of the Act on an ongoing basis.

Peabody's Group Procurement & Supplier Relationship Management (SRM) Team has responsibility to work with colleagues to enhance our contract management expertise through training and direct support, to improve reporting from our suppliers against Key Performance Indicators (KPIs) and ensure that compliance is adhered throughout the life of the contract.

In relation to our development activities, Peabody Group has a strong view that combatting modern slavery and human trafficking should be a priority for all in the construction industry given the risks of exploitation. Actions to date by our Development Team have included:

- conducting a review alongside our Group Procurement & SRM Team to ensure that our compliance requirements within methods of shortlisting and assessing building contractors are sufficiently robust;
- requesting and reviewing Modern Slavery statements, policies, and updates from our existing contractors;
- updating our Employer's Requirements to include a specific requirement for contractors to provide posters on site signposting modern slavery helplines;
- rolling out an appropriate e-learning module which all colleagues in our Development Team are required to take annually;
- reviewing further measures on a continuous basis, such as a protocol for monitoring via monthly site meetings and site inspections; and

- conducting a continuous review of our Development Control Manual to consider, amongst other things, further detail on understanding and how to act if any particular instances are detected on site.

Actions undertaken by our customer-facing teams who are involved in providing services to our customers include:

- checking for signs of modern slavery and human trafficking during home or site or scheme visits, as well as any other welfare concerns which the residents or members of their households or our contractors or members of the public may have;
- where we have concerns, we undertake a review to investigate the matter (using specialist and/or independent advice where required) and report the matter to the relevant authorities in line with our policies and procedures and wider safeguarding approach; and
- thoroughly investigating reports of sub-letting and taking robust action against it. Peabody Group will support prosecutions where it is appropriate and issue money claims to prevent profiteering from subletting social housing.

4. Due Diligence in relation to Modern Slavery

In spring 2025, a potential case of labour exploitation was identified following concerns raised by a line manager regarding unusual communication from a long-serving colleague. Further enquiries indicated the possibility of identity fraud linked to organised criminal activity and potential modern slavery.

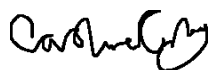
Whilst Peabody Group maintains robust right-to-work measures, this case serves to highlight that risks remain, particularly in relation to increasingly sophisticated fraudulent documentation. It also underscores the importance of continued vigilance in identifying and escalating concerns. In the case referred to, appropriate referrals were made to the relevant authorities. A review of internal processes provided assurance that this was an isolated incident, with no wider control weakness identified.

We do not knowingly support or deal with any business involved in slavery or human trafficking.

Conclusion

This statement has been reviewed by Peabody Trust's Board on 23 July 2026. The Board is satisfied that it meets the requirements of the Modern Slavery Act 2015 and demonstrates Peabody Group's commitment to this area as a responsible employer and business.

Signed:



Caroline Corby

Chair of the Board