



Modern Slavery Act Transparency Statement

Introduction

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all of our business dealings and relationships. We are also committed to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our commitment extends to promoting transparency in both our operations and **in** our efforts to combat modern slavery throughout our supply chains. We expect **the same high standards from** all **our** contractors, suppliers, and **other** business partners to adhere to uphold the same high standards.

Organisation structure

We are a charitable Registered Provider of Social Housing in England, whose principal activities are the provision of affordable rented accommodation, the design and development of integrated health and care services and the development of homes for outright sale, affordable and supported housing.

Home Group comprises the parent Home Group Limited, together with the following organisations each of which is a subsidiary of Home Group Ltd :- Home Group Scotland Ltd, Home Group Repairs Partnership, Home Group Developments Ltd and North Housing Ltd.

We have an annual turnover more than £500m, have our head office in England and operate throughout England and Scotland.

This statement applies to Home Group and its subsidiaries as set out above.

Our business

We deliver our customer facing services through four distinct business units:

Customer and Communities: The delivery of services to our rented and supported customers

Maintenance and Building Safety: Delivery of repairs and maintenance services.

Development and Asset: Design and delivery of our new build homes, regeneration, and strategic asset management.

Care: Design and development of our integrated support services, and delivery of complex care.

Our supply chains

Home Group procures a wide range of goods and services via a diverse and varied supply chain, which includes some higher risk category areas such as:

- Property related services (construction and maintenance)
- Facilities management services including cleaning & Security
- Communications and IT equipment services
- Temporary/Agency staff
- Recruitment Services
- Workwear, PPE & Janitorial

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our business complies with the Ethical Trading Initiative (ETI) Base Code and adheres to the nine core principles that form the basis of that code.

We have robust HR policies and procedures in place and a Working Professionally Policy to ensure the fair treatment of all colleagues. We comply with all applicable employment legislation relating to colleague terms and conditions, including payroll and we invest in supporting the health and wellbeing of our colleagues.

Our Supplier Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our Safeguarding policies include specific guidance for colleagues on how to recognise signs of abuse, including slavery, human trafficking, forced labour and domestic servitude among our customers and how to respond to and escalate any concerns. We record modern slavery as an independent safeguarding category within our Accident and Incident Management System (AIMS) so if any colleague has a concern they can raise it directly. We have been directly involved, through our care and support business, in supporting a number of victims of modern slavery.

Our colleagues are protected by our Confidential Reporting (Whistleblowing Policy) which provides a framework for all colleagues, former colleagues and stakeholders to be confident

in the knowledge that, if they consider it appropriate to raise a concern they can report this without fear of retribution, victimisation or detriment. Colleagues may also report concerns using the independent and confidential EthicsPoint service.

Due diligence processes for slavery and human trafficking

In terms of colleague recruitment, we undertake all relevant pre-employment checks prior to colleagues being employed, to ensure they are eligible to work in the UK. We carry out fair and transparent recruitment processes and ensure that our recruitment agencies comply with these requirements in the provision of agency staff. When tendering for Home Group contracts we use a Procurement Specific Questionnaire (PSQ) to determine whether prospective suppliers have the necessary technical and professional ability for the contract. As part of this PSQ process we include requirements with regard to modern slavery standards that are appropriate to the contract and dependent on category area. Only suppliers who satisfy these criteria will be considered for further evaluation in the tender process. The PSQ is used to determine the risk profile of suppliers for supplier sustainability issues. Suppliers completing a Selection Questionnaire are also expected to provide evidence to support their responses to address their approach to modern slavery. Categories of supply found to be medium or high risk for modern slavery also require mitigation to be written into the tender documents. We have in place systems to protect whistle blowers.

Supplier adherence to our policies, values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our policies, values and ethics our standard terms and conditions requires suppliers to comply with our policies. In addition we have in place rigorous selection, due diligence in our selection/ tender processes and thereafter which helps to ensure that our suppliers and their supply chains are slavery free. As part of our Supplier Risk Assessment process and ongoing monitoring of our supply chain, we will be requiring our supply chain to complete modern slavery risk assessments which will be used as a KPI measure to ensure recommendations and improvements are completed by the relevant suppliers in a required timeframe and the information held on our supply base is kept up to date. Our contracts allow us the provision to conduct supplier audits or on-site assessments dependent on the nature of the goods or services being provided and on the industry sector in which the supplier operates. The frequency of these audits or on-site assessments will be determined by the risk profile and score of the contract and/or supplier identified in the modern slavery risk assessments. The nature and approach to auditing a supplier will be determined on a case-by-case basis. If an audit reveals risks of modern slavery to Home Group, then we will follow a Remedial Action Plan and work with suppliers to ensure remediation to workers and prevention of future incidents. Failure to make sufficient changes or work with Home Group could result in termination of the supplier's contract.

We encourage anyone, including colleagues, subcontractors, suppliers, and customers to report in good faith any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking through our confidential external whistle-blowing hotline.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adult or children.

Training

We provide essential safeguarding and annual refresher training to all colleagues, which covers how to spot the signs and indicators of modern slavery, and modern slavery specific training is available to all colleagues. This extends to direct labour colleagues to enable them to identify safeguarding concerns, including slavery when visiting customers' properties to carry out repairs. Additionally, all Procurement colleagues receive in depth training on modern slavery in supply chains.



CHIEF EXECUTIVE
HOME GROUP
LIMITED

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