

Company policy statement Modern slavery act

2020

Modern Slavery Act Transparency Statement – 2019

Introduction

This statement has been prepared in accordance with the Modern Slavery Act 2015 and has been made in respect of 2019.

At Vistry Group, we recognise that modern slavery can occur in the construction industry and it is a risk to our business. We operate an Anti-Slavery and Human Trafficking Policy (**Policy**) which outlines our zero-tolerance approach to modern slavery and human trafficking and supports our efforts to combat modern slavery.

Our business and supply chain

Vistry Group is a top five national housebuilder incorporating the operations of Bovis Homes, Linden Homes and Vistry Partnerships. The housebuilding business operates across 13 business units and involves the design, build and sale of new homes ranging from two-bedroom starter homes to larger four and five-bedroom family homes. Our partnerships business operates through 10 business units, combining both contracting and development led capabilities across all housing tenures, working closely with Government bodies, housing associations and local authorities.

Vistry Group partners with Supply Chain Sustainability School and is a member of the Modern Slavery Engagement Programme which aims to increase awareness and provide guidance and training to our supply chain.

Our supply chain involves local, national and international companies. Each region is responsible for the sourcing and supply of goods and services to each of their development sites. We maintain a number of Group-wide deals with national suppliers whose products or services are required to be used across our developments.

Vistry Group complies with all relevant employment laws and require our sub-contractors, suppliers and wider supply chain to also confirm compliance.

Policies

Our Policy applies to all staff and is incorporated into our agreements with both sub-contractors and suppliers.

The Policy outlines our zero-tolerance approach to slavery and human trafficking. It also sets out what actions individuals should take if they are concerned that slavery or human trafficking is taking place in our business or supply chain.

To ensure that the risk of slavery or trafficking is eliminated, we will engage with sub-contractors and suppliers to require that they improve their practices where concerns are identified.

The Policy is complimented by our:

- "Speak Up" whistleblowing policy;
- Anti-bribery and corruption policy;
- Anti-fraud policy;
- Ethical code of conduct policy; and
- Health, safety and welfare policy

Our policies are reviewed on an annual basis.

Copies of our policies are available on our website at: vistrygroup.co.uk/responsibilities/csr-reports/2020.

There were no whistleblowing reports of modern slavery received in Vistry Group during 2019.

Due diligence

All of our contractors are subject to due diligence via our adjudication process. Part of this process includes a review of sustainability matters. Our adjudication process and contract conditions incorporate awareness notes relating to modern slavery.

The adjudication process involves a face to face meeting between our Site teams, Commercial teams and the relevant contractor to discuss contract orders and Vistry Group policies, and how they are best implemented. If any concerns are raised, then further clarification may be sought.

Where contractors are unaware of the risk of modern slavery, they will be provided with information on where to find guidance relevant to their business.

We meet regularly with our suppliers to review their performance and, if necessary, raise matters of concern.

High risk areas

The construction industry generally can include areas of high risk, with a number of job roles which have a low skill requirement and provide potential opportunities for the exploitation of individuals.

The materials and goods that make up our homes may include raw materials from, or may be assembled in, countries that are at high risk of slavery and/or human trafficking.

Each business unit is responsible for procuring goods and services for the developments in their area. This often means working with local businesses which may not be aware of the potential for slavery and human trafficking.

We have sought to address the areas of high risk in our training and in our actions, as set out in the review of 2019, below.

Training

The Group's induction programme includes an overview of sustainability matters, including modern slavery awareness.

Review of 2019

In 2019 we:

- Added Modern Slavery as a standing agenda item to the quarterly Build Quality Forum to better align on-site standards and controls;
- Refreshed our renamed "Speak Up" whistleblowing policy to enhance employee visibility and understanding, which was rolled out in January 2020;
- Commenced consideration of the introduction of biometric systems throughout our construction sites;
- Adopted agreed KPIs to measure, throughout 2020, how effective we have been in ensuring that slavery or human trafficking is not taking place in our business or supply chain; and
- Reviewed the training needs for our staff and worked with the Supply Chain Sustainability School to develop training opportunities for our suppliers and sub-contractors.

Further steps

During 2020 we intend to:

- Ensure the effective integration of our Policy throughout our enlarged Vistry Group following the acquisition of Linden Homes and Vistry Partnerships in January 2020;
- Develop our training opportunities for suppliers and sub-contractors through our partnership with Supply Chain Sustainability School;
- Review induction training for all our staff (including the potential for e-learning);
- Sign up to the Gangmasters and Labour Abuse Authority Construction Protocol; and
- Monitor how effective we have been in ensuring that slavery or human trafficking is not taking place in our business or supply chain by measuring against our adopted KPIs.

Approved by the Board and authorised for issue by:



Greg Fitzgerald
Chief Executive
20 May 2020