

Company policy statement

Modern slavery act

Modern Slavery Act transparency statement – 2016

Bovis Homes Group PLC and Bovis Homes Limited (together "Bovis Homes").

Introduction

This is our first statement prepared in accordance with the Modern Slavery Act 2015 and has been made in respect of 2016.

Bovis Homes has a zero tolerance approach to modern slavery and human trafficking.

Our business and supply chain

Bovis Homes is a builder of high quality traditional homes in England. Our business involves the design, build and sale of new homes for private individuals, registered social landlords and professional investors. We operate across eight regions.

Bovis Homes is a member of the FTSE4Good Index. 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 on all developments, unless there is a compelling reason not to use them. Such suppliers include those of brick and block and insulation materials.

Bovis Homes complies with all relevant employment laws and expects its sub-contractors, suppliers and wider supply chain to do the same.

Policies

We have adopted an anti-slavery and human trafficking policy (the "Policy") during 2016. The policy applies to all staff and is, or will be on the next review, incorporated into our agreements with 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.

If concerns are raised with us regarding a particular sub-contractor or supplier, we may work with them to improve their practices to ensure that slavery or human trafficking is eliminated.

The Policy is complimented by other policies covering:

- Whistleblowing policy – which sets out a confidential, and if required, anonymous reporting line for individuals provided by an independent third party;
- Anti-bribery and corruption;
- Anti-fraud; and
- Ethical code of conduct.

All of our policies are reviewed on an annual basis.

Copies of our policies are available on our website: www.bovishomesgroup.co.uk.

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. It is intended to incorporate matters relating to modern slavery into the adjudication process.

High risk areas

The construction industry generally can include areas of high risk, with a number of jobs that 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 region 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.

In 2016 we:

- Contacted our group-wide suppliers to begin to understand their awareness of modern slavery;
- Began mapping our supply chain to identify potential areas of high risk;
- Commenced a review of how we can use technology to check ID for staff on the payroll and sub-contractors on our sites;
- Updated our terms and conditions for the purchase of goods and our sub-contractors to include a clause that we will not tolerate slavery or human trafficking in our supply chain;
- Adopted an anti-slavery and human trafficking policy;
- Reviewed our relationships with recruitment agencies to identify any practices that may present a high risk of slavery or human trafficking;
- Begun exploring training needs for our staff and also our sub-contractors to recognise potential signs of slavery or human trafficking and what to do in these circumstances; and
- Recruited additional resource for our group Commercial function which will, amongst other things, support initiatives in relation to modern slavery.

Training

All new starters attend the Group's induction programme which includes an overview of sustainability matters.

Following a review of training requirements, we will be introducing a site induction video later this year for all individuals accessing the construction side of our developments (which includes sub-contractors and suppliers) that includes a section on modern slavery. The site induction will be followed by a short test to ensure understanding of the contents.

A review of training for our Commercial and Build staff will commence shortly.

Further steps

During 2017 we intend to:

- update our due diligence process for contractors;
- review the guidance we can provide to our sub-contractors to raise awareness of modern slavery;
- complete the mapping of our supply chain to identify potential areas of high risk;
- roll out training for staff;
- identify high risk areas in our wider supply chain; and
- review appropriate KPIs for our business.

Approved by the Board and authorised for issue by:



Greg Fitzgerald
Chief Executive
9 June 2017