

Company policy statement

Modern slavery act

Modern Slavery Act transparency statement – 2017

Bovis Homes Group PLC and Bovis Homes Limited (together “Bovis Homes”).

Introduction

This statement has been prepared in accordance with the Modern Slavery Act 2015 and has been made in respect of 2017.

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 seven 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 across our developments.

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

Policies

We adopted an anti-slavery and human trafficking policy (the “Policy”) in 2016. The Policy applies to all staff and is 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: 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. In 2017 we revised our adjudication process and contract conditions to 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 Bovis Homes 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 further information 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 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 2017 we:

- We mapped our supply chain to identify areas of high risk and have begun to work with these suppliers to understand their own processes, including requesting copies of their own modern slavery processes;
- Revised our adjudication process to incorporate questions relating to modern slavery and provide an opportunity to discuss this topic with our sub-contractors;
- Updated our whistleblowing process and conducted a Group-wide re-launch to raise awareness of this service;
- Reduced the number of recruitment agencies that we use for permanent employees in order to better manage the supply of labour;
- Appointed an external recruitment process provider for temporary worker recruitment, reducing the number of agencies we use and providing an audit and monitoring service which incorporates matters relevant to modern slavery; and
- Rolled out a series of training programmes for our sub-contractors on various topics with an assessment of modern slavery training currently under consideration.

Training

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

We are trialling 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. If successful, it is anticipated that a phased roll-out will be undertaken over the remainder of 2018 and the first half of 2019.

A review of e-learning for all staff is also being considered in order to ensure continued awareness of this topic.

Further steps

During 2018 we intend to:

- Conduct a pilot of an on-site electronic ID and induction process;
- Review relevant training, including the potential for e-learning, for all of our staff;
- Further incorporate modern slavery awareness into our procurement process, to ensure that potential sub-contractors are aware of our requirements;
- Identify an action plan for engaging with high risk suppliers;
- Adopt a preferred sub-contractor list for all of our regional businesses; and
- Review appropriate KPIs to measure how effective we have been in ensuring that slavery or human trafficking is not taking place in our business or supply chain.

Approved by the Board and authorised for issue by:



Greg Fitzgerald
Chief Executive
23 May 2018

