

Company policy statement

Modern slavery act

Modern Slavery Act transparency statement – 2018

Introduction

This statement has been prepared in accordance with the Modern Slavery Act 2015 and has been made in respect of 2018.

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 Supply Chain Sustainability School and is part of both the leadership group and the Modern Slavery Act sub-group.

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

Our anti-slavery and human trafficking policy (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 – 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;
- Ethical code of conduct; and
- Health, safety and welfare.

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. 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 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 2018 we:

- Appointed a Performance Director to assess site-based quality and performance checks across the Group;
- Conducted a pilot of an on-site electronic ID and induction process and as a result, we are considering the roll-out of a new ID and induction process;
- Further incorporated modern slavery awareness into our procurement process to ensure that potential sub-contractors are aware of our requirements. We now ask all sub-contractors to provide us with their Modern Slavery Act statement and incorporate a requirement into our terms and conditions that our sub-contractors must comply with the provisions of the Modern Slavery Act;
- Adopted a preferred sub-contractor list for each of our regional businesses and such sub-contractors must have confirmed their awareness of the Modern Slavery Act requirements;
- Engaged Datum to carry out regular audits of our agency workers to reduce the risk of modern slavery and ensure transparency in our supply chain;
- Became a member of The Supply Chain Sustainability School and form part of the leadership group and the Modern Slavery Act sub-group; and
- Rolled out a campaign to promote awareness of our whistleblowing policy and hotline number throughout the Group.

Training

All new starters attend the Group's induction programme which includes an overview of sustainability matters, including modern slavery awareness.

We are intending to trial a new site induction video 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 in 2019 and 2020.

Further steps

During 2019 we intend to:

- Hold quarterly meetings to better align on-site standards and controls, as part of the Build Quality Forum created in 2018;
- Rename and refresh our whistleblowing policy to 'Speak up' to enhance employee visibility and understanding;
- Consider the introduction of biometric systems for construction sites (through fingerprint recognition) designed to cater for online inductions, reading and importing of CSCS SmartCard and photographic information including uploading of data such as training records, inspection records, insurance documents, risk and method statements;
- Adopt 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; and
- Continue a review of relevant training, including the potential for e-learning for our staff and providing training opportunities to our suppliers through The Supply Chain Sustainability School.

Approved by the Board and authorised for issue by:



Greg Fitzgerald
Chief Executive
22 May 2019

