

Introduction

We are committed to improving our practices to combat slavery and human trafficking. We oppose slavery and human trafficking in all its forms and make this statement to set out the steps we have taken to ensure that there is no slavery or human trafficking in our business or in our supply chains.

Organisation and business structure

We are a business specialising in the development of building projects. We employ about 30 staff whose numbers fluctuate and engage contractors and sub-contractors whose numbers fluctuate from time to time depending upon the number of projects in progress who operate in the United Kingdom. We have made this statement pursuant to s54 of the Modern Slavery Act 2015.

Our supply chains

Our supply chains include: [Building material suppliers, construction contractors, sub-contractors, consultants and professional advisors including health and safety.

We also work closely with a range of stakeholders including housing associations, housebuilders, funders, local and planning authorities, regulatory bodies and joint venture partners.

The activities of the Group and its joint ventures are undertaken solely in the United Kingdom.

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 Anti-slavery Policy 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.

Due diligence processes for slavery and human trafficking

To help identify and monitor the risk of slavery and human trafficking in our supply chain, all new suppliers will be assessed upon engagement and thereafter, as appropriate, to check on their MSA compliance status. All training of staff will also be monitored to ensure internal compliance with our Modern Slavery Policy.

We are working towards having systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.



Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we are working towards a supply chain compliance programme.

We have a dedicated compliance team, which consists of involvement from the following departments:

- [Legal over seen by the Managing Director].
- [Audit and compliance are handled by the Finance Director].
- [Human resources is handled by the Finance Director].
- [Procurement is handled by the Commercial Manager and the Senior Buyer].
- [Sales is handled by the Head of Sales or Land Director].

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide ongoing training to our staff.

Our effectiveness in combating slavery and human trafficking

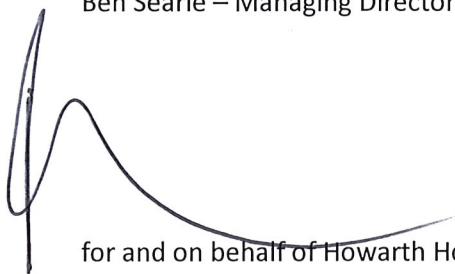
We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- The percentage of suppliers and sub-contractors vetted for ethical labour practices.
- The number of reported breaches in the past year.
- Percentage of staff receiving training on identifying and addressing the risk of slavery and human trafficking in our business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2020.

It was approved by the board on 23rd September 2021.

Ben Searle – Managing Director

A handwritten signature in blue ink, consisting of a stylized 'B' followed by a long, sweeping horizontal stroke.

for and on behalf of Howarth Homes PLC

Date: 23rd September 2021