

### INTRODUCTION

This statement has been prepared in accordance with the Modern Slavery Act 2015 and has been made in respect of Vistry Group PLC, Vistry Homes Limited, Vistry Partnerships Limited, Vistry Linden Limited, Linden Limited, Drew Smith Limited, Vistry Partnerships Yorkshire Limited, Vistry Partnerships Yorkshire Holdings Limited and all their subsidiaries, specifically including Grange Walk LLP, Opal Silvertown LLP, DR4 Developments LLP and Linden Wates (The Frythe) Limited (together 'Vistry Group') for 2020.

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 & SUPPLY CHAIN

Vistry Group is a top five national housebuilder incorporating the operations of Bovis Homes, Linden Homes, Drew Smith 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 business unit 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.

Our Modern Slavery Act working group oversees the Group's approach to preventing modern slavery in the business. It comprises a collaborative cross-functional team which meets on an at least quarterly basis to consider the evolving risk profile and to drive forward our work against modern slavery.

## **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 prevented, 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:

[www.vistrygroup.co.uk/sustainability/sustainability-reports/2021](http://www.vistrygroup.co.uk/sustainability/sustainability-reports/2021)

Our SpeakUp hotline is independently operated by EthicsPoint and can be used to report any concerns of modern slavery. There were no reports of modern slavery in the Vistry Group made to EthicsPoint in 2020.

## **DUE DILIGENCE**

All of our contractors are subject to due diligence via our onboarding process which ensures that our suppliers and sub-contractors have an awareness of our modern slavery commitments, along with our expectations.

The onboarding 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.

We require our Group suppliers to confirm their understanding of our Modern Slavery policy and provide copies of their own modern slavery policies.

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.

## TRAINING

The Group's 'Vistry Welcome' induction programme includes an overview of the Group's sustainability strategy, including modern slavery awareness.

## REVIEW OF 2020

In 2020 we:

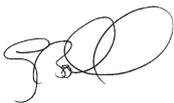
- Maintained Modern Slavery as a standing agenda item to the quarterly Build Quality Forum to ensure the alignment of on-site standards and controls;
- Ensured that our people have access to a dedicated Modern Slavery Awareness training page on our Group intranet, which provides guidance on understanding modern slavery in the construction industry, how to spot the signs of modern slavery, contact details for relevant agencies and details of our SpeakUp whistleblowing hotline;
- Updated the 'Vistry Welcome' induction programme to include modern slavery;
- Pledged our commitment to the Gangmasters and Labour Abuse Authority Construction Protocol;
- Reviewed our 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
- Reviewed the training needs for our staff and worked with the Supply Chain Sustainability School to develop training opportunities for suppliers and sub-contractors.

## FURTHER STEPS

During 2021 we intend to:

- Continue the effective integration of our Policy throughout Vistry Group;
- Incorporate Modern Slavery awareness training into our SHE on-boarding. This is a 1.5 day training course delivered to all build team members that join the company.
- Prepare and issue a modern slavery awareness toolbox talk across sites.
- Issue Modern Slavery awareness posters in multiple languages across the Group.
- Require copies of modern slavery policies and require enhanced protocol statements for supply chain partners that we have classified as high risk.
- Continue to 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

Date: 17<sup>th</sup> May 2021