Appendix A – 2026 Modern Slavery Statement

Modern Slavery Statement for publication on the Havebury website

MODERN SLAVERY STATEMENT 2026

INTRODUCTION

Slavery and Human Trafficking remain a hidden blight within society. Havebury Homes as a socially responsible business, has a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Employees are expected to report any concerns, and management and the Board are expected to act upon them to ensure that slavery and human trafficking is not taking place within our organisation or supply chain.

OUR STRUCTURE AND BUSINESS

We are a charitable registered society under the Co-operative and Community Benefit Societies Act 2014 (7648) and are regulated by the Regulator of Social Housing (LH4339). Our registered office address is Havebury House, Western Way, Bury St Edmunds, Suffolk, IP33 3SP.

We have two wholly owned property services and development subsidiaries operating within the East Anglia Region - Design & Build Services East Ltd, which is currently dormant but specialises in the procurement of building and development services and Havebury Developments Ltd, which develops properties for market sale.

We are a specialist provider of affordable and social housing and provides a comprehensive range of services and maintenance for over 7,900 homes predominantly in West Suffolk, extending to the surrounding East Anglia region. We have an annual turnover in excess of £66 million and employ over 300 members of staff.

RISK ASSESSMENT

The areas within our business where there is a high risk or possibility of encountering modern slavery are procurement, people services and in front line customer facing roles. Sectors within our supply chains where there is a high risk of modern slavery include construction and cleaning services.

As a housing provider, we have vetting processes in place which monitor the people whom we house, as well as ensuring, through our tenancy visits, that our properties are not used for the purposes of trafficking or allowing modern slavery to exist.

As we are based in and operate solely within the UK, we have identified that our overall exposure to the risk of slavery and human trafficking is quite low. However, within our business, particular attention is paid to construction contracts and the use of sub-contracted labour.

OUR SUPPLY CHAINS

We predominantly trade within the UK, with only three suppliers of IT/Occupational Health solutions being based outside of the UK, and wherever possible procure labour and materials within the local community. Our supply chains include construction, building maintenance, heating and kitchen installation, property cleaning and maintenance services and purchasing of ICT and office equipment principally related to the management, maintenance, and provision of social and affordable housing. We also work with specialist providers who provide care and support services to our residents.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we provide awareness training to members of staff. The following actions are undertaken by us:

- Modern slavery is considered during policy reviews and relevant amendments are made to Safeguarding Policies and Protection from Harassment Policies.
- People policies and procedures ensure that all employees have a legal right to work in the UK, are paid a fair and legal wage, and have a safe working environment. All staff are treated equally and proportionately in any disciplinary procedure.
- Compliance with the Modern Slavery Act is included within new supplier selection processes or the supplier onboarding process, specifically within the Supplier Suitability Assessment, and any failure to meet this will lead to disqualification of the applicant.
- Our Ethical Business Policy includes standards of employment complying with the UK Modern Slavery Act as well as the Ethical Trading Initiative (ETI) base code.
- All new suppliers, as part of the onboarding process, are required to read and agree to abide to the principles and terms within our Ethical Business Policy.
- The Contract Register is reviewed and monitored by Contract Managers, Procurement and the Leadership Team to identify high-risk contracts.
- Data collated from contract review meeting reports is be used to help monitor the effectiveness of processes in ensuring the absence of Slavery and Human Trafficking in any part of our business or supply chain.

Havebury promotes open and transparent communications between managers and staff. Havebury also has policies such as a Whistleblowing Policy under which employees can raise concerns including those relating to Modern Slavery.

Any non-compliance discovered will be dealt with on a case-by-case basis, and where appropriate the relevant authorities will be notified.

Our contracts will include specific clauses in relation to Modern Slavery and contractors will be legally bound to certify that they in turn conduct due diligence on their supply chains.

TRAINING

We continually seek ways to raise employee awareness of the risks of modern slavery and human trafficking via our learning programmes and our communication channels. We will continue to provide relevant information and training to our employees during 2026 on the topic as part of our ongoing work to manage these risks, such as raising awareness of the links with money laundering and human trafficking, and what can be done to prevent it. We will also continue to encourage our business partners to provide training to their employees and suppliers.

SIGNED by Andrew Smith, Chief Executive, with delegated authority for an on behalf of Havebury Homes	**Signed copy available on request**
DATED	**25 November 2025**