



# Anti-Slavery and Human Trafficking Statement

Crest Nicholson is committed to operating ethically, with zero tolerance for modern slavery and child labour, across our business and in our relationships with stakeholders.

This is Crest Nicholson's Anti-Slavery and Human Trafficking Statement for the financial year ending 31 October 2024 and is prepared in accordance with Section 54 of the Modern Slavery Act 2015. The statement explains the policies and activities we have in place to mitigate the risk of all forms of modern slavery in our business and supply chain.

## An Overview of our Organisational Structure and Operations

### Our Business

Crest Nicholson Holdings plc is a FTSE250 listed housebuilder operating only in the UK. Core operations are run through regional housebuilding divisions, each handling local developments and construction. There are two central divisions, one specialising in strategic land acquisitions and supporting projects through the planning process, and a Special Projects division which focuses exclusively on fire remediation and legacy sites.

Where we refer to 'Crest Nicholson' or the 'Group' in this statement, we mean Crest Nicholson Holdings Plc (company registration number 6800600). [Any and all subsidiaries of Crest Nicholson Holdings Plc](#) are covered by this statement.

### Our Supply Chain

Our tier-one supply chain is primarily UK-based, with some material suppliers based in Europe. It consists of different organisations that vary in size and in the goods and services they provide. These can be categorised into three main segments: material suppliers, sub-contractors and agency labour, and consultants.

## Policies Relating to Slavery and Human Trafficking

The Group has a suite of policies that support our efforts to reduce the risk of slavery and human trafficking within our business and supply chain.

1. Sustainable Procurement Policy and Supply Chain Code of Conduct
  - Our Sustainable Procurement Policy and Supply Chain Code of Conduct define clear expectations for environmental, ethical and social performance for our supply chain, including mitigating against the risk of slavery, human trafficking and child labour.
2. Corporate Health and Safety Policy
  - This policy outlines our commitment to supporting the health, safety and welfare of our employees and those affected by our operations. We strive to create a workplace environment that safeguards against exploitation.
3. Anti-Bribery and Corruption Policy
  - This policy sets out a clear code of conduct so that everyone acting on behalf of Crest Nicholson fully understands and conducts themselves in accordance with the legal regulations relating to bribery and corruption.

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#### 4. Speaking Up: Our Whistleblowing Policy

- Our whistleblowing framework encourages all stakeholders, including employees, suppliers, contractors and customers, to report concerns or unethical practices, including suspected cases of modern slavery and human trafficking.
- To facilitate reporting, we provide a free and confidential whistleblowing hotline and online reporting platform, with clear communication of access across our sites and offices.

#### 5. Human Rights Policy

- Our Human Rights Policy reaffirms our commitment to respecting and safeguarding human rights throughout our operations, supply chain and communities.

Our policies are available on our website at: [crestnicholson.com/our-business/our-policies](https://crestnicholson.com/our-business/our-policies)

## Due Diligence and Risk Management

We consider the following areas of our business and operations to be at greatest risk of modern slavery and human trafficking:

### On-site labour

There is a risk of modern slavery in the labour provided to Crest Nicholson indirectly through sub-contractors and agencies.

### Materials used in construction

There is a risk of modern slavery in the upstream supply chain. This risk arises when constituent parts of materials that the Group procures directly from tier-one suppliers are produced outside the UK and Europe, where employer and human rights legislation may be less stringent.

## Action Taken to Mitigate Risk

### Our Supply Chain Code of Conduct

Our Supply Chain Code of Conduct, updated in 2023, outlines our expectations for supply chain partners on critical social and environmental matters. This includes a requirement for supply chain partners, no matter the size of their organisation, to manage their business operations in a manner consistent with the Modern Slavery Act 2015, while also upholding the fundamental conventions set by the International Labour Organisation (ILO). We retain the right to conduct supply chain audits to check these standards are met.

### Contractual terms

Embedded in our contractual agreements is a requirement to adhere to our Supply Chain Code of Conduct. Additionally, specific terms relating to the Modern Slavery Act 2015 reinforce our requirements for suppliers and subcontractors. This includes ensuring that employees have the legal right to work in the UK, compliance with current employment legislation and the provision of statutory employment benefits. All subcontractors are required to provide evidence of a current accreditation by a Safety Schemes in Procurement (SSIP) member scheme, which certifies health and safety competence.

### Supply chain engagement

We continue to partner with the Supply Chain Sustainability School, of which we have maintained Gold status membership. In 2023 we developed and launched a tailored learning pathway for our supply chain in collaboration with the School. The pathway features free training material, including a module on addressing the risk of modern slavery.

## **Direct employees**

Operating exclusively in the United Kingdom, our human resource processes align with UK law, best practice guidelines and ILO conventions. These processes help us maintain high standards of direct employee recruitment. Every employee of the Group is contracted and undertakes employment of their own free will.

## **Real Living Wage**

In 2024 we maintained our accreditation as a Living Wage Employer from the Living Wage Foundation. All direct employees receive at least the real Living Wage, with annual reviews ensuring continued compliance. Apprentices are paid in line with a different pay scale that adheres to statutory guidelines.

Our Supply Chain Code of Conduct requires subcontractors working on our sites to pay their employees at or above the real Living Wage. We communicate our Living Wage Employer status across our sites, promoting transparency and providing avenues to report potential non-compliance through our whistleblowing channels.

## **Labour agencies**

In 2023 we reviewed and strengthened our processes for engaging labour agencies to mitigate modern slavery and other business risks. This led to the implementation of the Engage system, which was fully operational from 2024. Engage introduces a centralised, single point of contact for labour agency management, significantly reducing the risk of engaging with agencies not on our preferred supplier list.

The system enhances transparency and governance of our temporary workforce by:

- Providing access to right to work and other documentation to support compliance with legal requirements.
- Providing real-time reporting on labour agency usage and workforce data.
- Facilitating direct recording of temporary workers with HMRC, reducing the risk of fraudulent practices.

Additionally, the Engage system embeds our commitment to fair pay by reinforcing our policy to pay at least the real Living Wage to agency workers, in line with requirements of the Living Wage Foundation.

## **Training, Awareness and Managing Disclosure Across Our Business**

### **Modern slavery e-learning module**

Our modern slavery e-learning module is a mandatory part of our induction process, with all existing employees required to complete it annually. This training helps our teams understand the risks associated with modern slavery in our industry and emphasises recognising signs of exploitation on our sites.

### **Training and awareness across our divisions**

In 2024 we enhanced awareness of modern slavery risks by delivering updates through departmental functional forums and divisional presentations. These sessions provided insights into identifying potential risks and reinforced the steps to take if a case is suspected.

To further support education and awareness, our Group intranet features a dedicated modern slavery resource page offering guidance on recognising the signs of modern slavery and instructions for reporting concerns. On Anti-Slavery Day in October 2024, we issued a Group-wide news bulletin emphasising how to spot potential cases and the appropriate actions to take. Additionally, we expanded our communication efforts by developing posters translated into the languages commonly spoken in regions at higher risk of modern slavery. These posters, designed to increase accessibility and understanding, outline how to recognise the signs of modern slavery and provide reporting guidance. They are displayed across our sites and offices.

### **No reported cases in FY24**

There were no reported cases of modern slavery in 2024. We remain committed to ongoing evaluation and improvement to further enhance safeguards against modern slavery in our operations and supply chain.

The board of directors of the Company approved this statement at its board meeting on 16 January 2025.

**Martyn Clark, Chief Executive Officer**

**January 2025**