



# 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 2023 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 five regional housebuilding divisions and a centralised specialist Partnerships and Strategic Land division (CNPSL).

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 predominantly UK-based, with some material suppliers based in Europe. This first-tier supply chain comprises different organisations that vary in size and in the goods and services they provide. These can be divided 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
  - Sets out clear environmental, ethical and social obligations for our supply chain, including mitigating against the risk of slavery and human trafficking.
2. Corporate Health and Safety Policy
  - We are committed 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
  - The 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 policy is accessible and written in plain language to encourage all stakeholders, including colleagues, customers, suppliers and contractors to report concerns or malpractice.
- To facilitate reporting we provide a free and confidential whistleblowing hotline. The number and website to report concerns is communicated clearly on posters across our sites and offices.

#### 5. Human Rights Policy

- Our commitment to respecting and safeguarding human rights extends across our operations, supply chain, customers 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 achieved Gold status membership. In FY23 we developed and launched a tailored learning pathway for our supply chain in collaboration with the School, which is initially mandated for our suppliers with Group Trading Agreements. 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 FY23 we achieved accreditation as a Living Wage Employer from the Living Wage Foundation. All direct employees are paid at or above the real Living Wage and this is reviewed annually. Apprentices are subject to a different pay scale, which is in line with statutory guidelines. Our Supply Chain Code of Conduct sets out a requirement that subcontractors working on our sites are also paid the real Living Wage. We communicate our Living Wage Employer status across our sites, ensuring transparency and providing avenues to report potential non-compliance through our whistleblowing channels.

## **Labour agencies**

In FY23 we conducted a review of our processes for engaging with labour agencies resulting in the implementation of our new system, Engage. This system is designed to mitigate the risk of modern slavery by establishing a single point of contact, reducing the likelihood of using agencies not on our preferred supplier list. It enhances transparency and reporting for our temporary workforce, providing streamlined access to right to work documents and automatic recording of temporary workers with HMRC. Additionally, the Engage system facilitates communication of our commitment to paying in line with the real Living Wage, providing fair compensation for our workforce.

## **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 and all existing employees are required to complete it annually. The training module helps our teams understand the risks associated with modern slavery in our industry and emphasises recognising signs of potential issues on our sites.

### **Training for HR team**

In 2023 we provided additional training on modern slavery to our HR team, focusing on industry insights and our internal procedure for handling suspected cases.

### **Raising awareness**

Our Group intranet features a dedicated page on modern slavery. It provides guidance on identifying signs of modern slavery and clear instructions for reporting suspicions. To raise awareness, we issued a news bulletin across the Group on Anti-Slavery Day in October 2023. Additionally, posters that contain information on spotting the signs of modern slavery and how to report concerns are displayed across our sites and offices. Posters in foreign languages will be distributed to sites in early 2024.

### **No reported cases in FY23**

There were no reported cases of modern slavery in FY23. We are 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 17 January 2024.

**Peter Truscott, Chief Executive**

**January 2024**