



# 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 2022 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 seven 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 numerous policies that set out our approach to the identification and prevention of unethical practices and that support our efforts to reduce the risk of slavery and human trafficking in our business or supply chain.

- Sustainable Procurement Policy – Sets out our commitment to specify sustainable materials and work with supply chain partners that demonstrate a high regard for, and promote, social responsibility.
- Corporate Health and Safety Policy – Ensures, so far as is reasonably practicable, the health, safety and welfare of employees while at work and of others who may be affected by the Group's operations and undertakings.
- Anti-Bribery and Corruption 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.
- Whistleblowing Policy – We encourage all workers, customers, suppliers and contractors to report any concerns or malpractice. The policy has been written in an accessible language to support employees and subcontractors and is made available at all sites. Employees and supply chain partners are encouraged to report any concerns of malpractice in an open and honest way. The policy provides

details of a free independent helpline that can be used to report concerns while also detailing confidential support services that individuals could use if they need assistance in making a report.

- Human Right Policy – Sets out our commitment to respecting and safeguarding the human rights of the Group's employees and those who are associated with our operations, including our supply chain, customers and the communities in which we operate.

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 where constituent parts of materials that Crest Nicholson procure 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 details our expectations for supply chain partners relating to a variety of important 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 for the International Labour Organisation. We reserve the right to carry out supply chain audits to check these standards are met.

#### *Contractual terms*

Our contractual agreements include adherence to the Supply Chain Code of Conduct as well as introducing specific terms relating to the Modern Slavery Act 2015. These terms enhance our existing requirements for all suppliers' and subcontractors' employees to have the legal right to work in the UK and for companies to meet all current employment legislation and provide all 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*

In FY22, we issued a questionnaire to all Group suppliers that focused on material sustainability issues. This included questions relating to modern slavery and payment practices. The questionnaire also provided our supply chain partners with useful links to external resources on modern slavery and human rights.

#### *Directly Employed Staff*

As an organisation that only operates within the United Kingdom, we have a range of human resource processes, all of which follow UK law and best practice guidelines, as well as abiding by the International Labour Organisation (ILO) conventions. Our human resources practices help us strive to maintain the highest standards of direct employee recruitment. Every employee of the Group is contracted and undertakes employment of their own free will.

All directly employed staff are paid at or above the living wage. Apprentices are subject to a different pay scale, which is in line with statutory guidelines. We are also taking steps to become formally accredited by the Real

Living Wage Foundation. In FY22 we communicated our intention to gain accreditation to all our subcontractors and requested they complete a survey on their current payment practices. We are aiming to achieve accreditation in FY23.

### **Training, awareness and managing disclosure across our business**

In FY22 we updated our internal escalation procedure, which is in place to manage and report incidents within our operations. Updated modern slavery training was also provided to our HR team who are responsible for managing any reports of incidents.

We continue to maintain our modern slavery page on the Group intranet. The page includes information on identifying potential signs of modern slavery and guidance on what to do in the event of suspecting someone is a potential victim. We issued a news bulletin across the Group to raise awareness of on Anti-Slavery Day in October 2022.

We have a modern slavery e-learning programme that outlines the risks of modern slavery in our industry, with particular focus on spotting the signs of modern slavery practices occurring on site to support an environment of active disclosure. The module is compulsory on induction and must be completed by all employees annually. As at 31 October 2022, 97% of targeted colleagues completed the training module.

In FY22, there were no reported cases of modern slavery. We will continue to review potential mitigation measures that will complement our current policies and procedures to mitigate the risk of instances of modern slavery occurring through our operations and supply chain.

The board of directors of the Company approved this statement at its board meeting on January 12, 2023.



**Peter Truscott, Chief Executive**  
**January 2023**