



Anti-Slavery and Human Trafficking Statement

Crest Nicholson is committed to operating ethically, with zero tolerance for modern slavery, 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 2021 and is published in compliance 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

Crest Nicholson is a FTSE250 listed developer operating only in the UK and predominantly within the southern half of England. 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.

Risks within our Operations

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

On-site labour – specifically there is a risk of modern slavery in the labour provided to Crest Nicholson indirectly through sub-contractors and agencies.

Materials used in construction – specifically 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.

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. This policy facilitates a more open and honest working environment by providing mechanisms and procedures that allow workers to make disclosures without fear of reprisal or retaliation. Concerns can be reported in several ways, including through an anonymous, confidential and free telephone service that the Group provides.
- 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.

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.

Action taken to reduce the risk of modern slavery

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 introduce 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 and assessment

In 2021, we completed an audit of our supply chain, requiring supply chain partners to complete a Statement of Compliance confirming that they support and adhere to our Supply Chain Code of Conduct and Anti-Slavery and Human Trafficking Statement. Companies with a turnover greater than £36m were requested to complete a questionnaire on how they mitigate the risk of modern

slavery. To help combat risk of slavery and human trafficking, we no longer work with suppliers who failed to adequately respond to our requirements.

In 2021, we developed a pre-qualification process (PQP) which will be used initially on all group supply tenders. The PQP includes questions relating modern slavery and a range of other environmental, social and governance matters.

Training, awareness and managing disclosure across our business

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. This e-learning is mandatory for all production staff and must be completed annually. It is also available to all office-based staff through our e-learning portal. In 2022, we will update the e-learning module and make it mandatory for all employees.

We have an Intranet resource page that provides further information to employees about modern slavery in the construction industry, the *Modern Slavery Act 2015*, and the steps the business is taking to mitigate the risk of modern slavery occurring in our operations and supply chain. We also have an escalation procedure in place to manage reported incidents of modern slavery in our operations.

In FY2021, there were no reported cases of modern slavery. We will continue to review potential mitigation measures that will complement our current policies and procedures in order to mitigate the risk of instances of modern slavery occurring through our supply chain.

The board of directors of the Company approved this statement at its board meeting on January 13, 2022.



Peter Truscott, Chief Executive Officer
January 2022