



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 2020 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 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 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 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 there may be less stringent employer and human rights legislation.

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.

- Procurement - Through our sustainable procurement policies we set out our commitment to specify sustainable materials and work with supply chain partners that demonstrate a high regard for, and promote, social responsibility.

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- Corporate Health and Safety – It is the policy of Crest Nicholson to ensure, so far as is reasonably practicable, the health, safety and welfare of its employees while they are at work and of others who may be affected by the Group’s operations and undertakings.
- Anti-Bribery and Corruption – The purpose of this Policy is to set down 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 – 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 a number of ways, including through an anonymous, confidential and free telephone service that the Group provides.

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. These policies and 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.

Our Supply Chain Code of Conduct and Contractual Terms

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.

Our contractual agreements were also updated in 2018 to include adherence to the new 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.

In 2020, we requested that our supply chain partners complete a Statement of Compliance confirming that they support and adhere to our Supplier Code 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. Responses are being collated at the time of updating this statement.

Promoting and managing disclosure across our business

Since 2017 we have had a robust escalation procedure to manage reported incidents of modern slavery in our operations. In 2019, our HR team received refresher training of the issues surrounding modern slavery in construction and the smooth operation of our escalation procedure.

Modern slavery posters continue to be visible on our sites to encourage employees and operatives to report their concerns to our whistleblowing hotline or a line manager, and potential victims to contact the [Modern Slavery Helpline](#).

Awareness and Training to Staff

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 in order to support an environment of active disclosure. This e-learning is mandatory for all production staff. It is also available to all office-based staff through our Intranet.

We have also included information about modern slavery in our corporate induction process for all personnel and developed 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.

Crest Nicholson 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 22, 2021.

A handwritten signature in blue ink, appearing to read 'P-117'.

Peter Truscott, Chief Executive Officer
January 2021