

Modern Slavery Act Transparency Statement - 2021

Introduction

This statement has been prepared in accordance with the Modern Slavery Act 2015 and has been made in respect of Vistry Group PLC, Vistry Homes Limited, Vistry Partnerships Limited, Vistry Linden Limited, Linden Limited, Drew Smith Limited, Vistry Partnerships Yorkshire Limited, Vistry Partnerships Yorkshire Holdings Limited and all their subsidiaries, specifically including Opal Silvertown LLP (together 'Vistry Group') for 2021.

At Vistry Group, we recognise that modern slavery can occur in the construction industry and it is a risk to our business. We operate an Anti-Slavery and Human Trafficking Policy ('Policy') which outlines our zero-tolerance approach to modern slavery and human trafficking and supports our efforts to combat modern slavery.

Our business & supply chain

Vistry Group is a top five national housebuilder incorporating the operations of Bovis Homes, Linden Homes, Drew Smith and Vistry Partnerships. The housebuilding business operates across 13 business units and involves the design, build and sale of new homes ranging from two-bedroom starter homes to larger four and five-bedroom family homes. Our partnerships business operates through 11 business units, combining both contracting and development led capabilities across all housing tenures, working closely with Government bodies, housing associations and local authorities.

Vistry Group continues to partner with Supply Chain Sustainability School and is a member of the Modern Slavery Engagement Programme which aims to increase awareness and provide guidance and training to our supply chain. In addition, Vistry Group has pledged its commitment to the Gangmasters and Labour Abuse Authority Construction Protocol during 2021 became a Real Living Wage Employer.

Our supply chain involves local, national and international companies. Each business unit is responsible for the sourcing and supply of goods and services to each of their development sites. We maintain a number of Group-wide deals with national suppliers whose products or services are required to be used across our developments.

Vistry Group complies with all relevant employment laws and require our sub-contractors, suppliers and wider supply chain to also confirm compliance.

Our Modern Slavery Act working group, attended by the Group's General Counsel, oversees the Group's approach to preventing modern slavery in the business. It comprises a collaborative cross-functional team which meets on at least quarterly basis to consider the evolving risk profile and to drive forward our work against modern slavery.

Policies

Our Policy applies to all staff and is incorporated into our agreements with both sub-contractors and suppliers. The Policy outlines our zero-tolerance approach to slavery and human trafficking. It also sets out what actions individuals should take if they are concerned that slavery or human trafficking is taking place in our business or supply chain. To ensure that the risk of slavery or trafficking is prevented, we will engage with sub-contractors and suppliers to require that they improve their practices where concerns are identified. The Policy is complemented by our:

- "Speak Up" whistleblowing policy;
- Anti-bribery and corruption policy;
- Anti-fraud policy;
- Diversity and inclusion policy;
- Ethical code of conduct policy; and
- Health, safety and welfare policy.

Our Group policies are reviewed on an annual basis. Copies of our policies are available on our website at: vistrygroup.co.uk/policies-and-publications

Our SpeakUp hotline is independently operated by EthicsPoint and can be used to report any concerns of modern slavery. There were no reports of modern slavery in the Vistry Group made to EthicsPoint in 2021.

Due diligence

All of our contractors are subject to due diligence via our onboarding process which ensures that our suppliers and sub-contractors have an awareness of our modern slavery commitments, along with our expectations.

The onboarding process involves a face to face meeting between our site teams, commercial teams and the relevant contractor to discuss contract orders and Vistry Group policies, and how they are best implemented. If any concerns are raised, then further clarification may be sought.

We require our Group suppliers to confirm their understanding of our Modern Slavery policy and provide copies of their own modern slavery policies.

We meet regularly with our suppliers to review their performance and, if necessary, raise matters of concern.

High risk areas

The construction industry generally can include areas of high risk, with a number of job roles which have a low skill requirement and provide potential opportunities for the exploitation of individuals.

The materials and goods that make up our homes may include raw materials from, or may be assembled in, countries that are at high risk of slavery and/or human trafficking.

Each business unit is responsible for procuring goods and services for the developments in their area. This often means working with local businesses which may not be aware of the potential for slavery and human trafficking.

Training

The Group's 'Vistry Welcome' induction programme includes an overview of the Group's sustainability strategy, including modern slavery awareness. Our people also have access to a dedicated Modern Slavery Awareness training page on our Group intranet, which provides guidance on understanding modern slavery in the construction industry, how to spot the signs of modern slavery, contact details for relevant agencies and details of our SpeakUp whistleblowing hotline. In addition, modern slavery awareness is incorporated into the Group's SHE on-boarding training which is delivered to all build employees.

Review of 2021

In 2021 we:

- Incorporated Modern Slavery awareness into the Group's SHE on-boarding training and, in addition, prepared and issued a Modern Slavery awareness toolbox talk across sites;
- Issued Modern Slavery awareness posters in multiple languages across the Group;
- Maintained our dedicated Modern Slavery Awareness intranet page, which provides guidance on understanding modern slavery in the construction industry, how to spot the signs of modern slavery, contact details for relevant agencies and details of our SpeakUp whistleblowing hotline;
- Required our high-risk supply chain partners to provide copies of their modern slavery policies and enhanced protocol statements;
- Reviewed our KPIs to measure how effective we have been in ensuring that slavery or human trafficking is not taking place in our business or supply chain;
- Completed an internal audit review on modern slavery risk in the Group; and
- Worked towards and became an accredited a Real Living Wage employer.

Further steps

During 2022 we intend to:

- Incorporate Modern Slavery checks into ISO audit processes and include site audits as a standing agenda item for the Modern Slavery Working Group;
- Assess the Group's performance against the CCLA Find It, Fix It, Prevent It Initiative indicators;
- Continue to work with our supply chain so that all of our third party workers are paid the Real Living Wage;
- Implement mandatory modern slavery training on the Group's learning management system, Vistry Learn;
- Roll-out a targeted modern slavery poster campaign across the Group's sites to increase individual awareness; and
- Continue to monitor how effective we have been in ensuring that slavery or human trafficking is not taking place in our business or supply chain by measuring against our adopted KPIs.

Approved by the Board and authorised for issue by:

Greg Fitzgerald
Chief Executive

18/05/2022