

## MODERN SLAVERY ACT TRANSPARENCY STATEMENT - 2024

### INTRODUCTION

This statement has been prepared in accordance with the Modern Slavery Act 2015 and has been made in respect of Vistry Group PLC and its subsidiary and joint venture companies, including those listed at the end of this statement (together 'Vistry Group') for 2024.

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's differentiated partnerships strategy underpins how we operate to deliver sustainable homes, communities and social value, leaving a lasting legacy of places people love. We work with more than 140 partners including registered providers, local authorities, and private rented sector providers, with all our developments providing a mix of housing tenures. We consider our highly valued supply chain as key business partners.

Our business operates through 26 regional business units across three divisions to deliver multi-tenure housing and in 2024 we delivered over 17,000 homes. Timber frame construction is at the core of Vistry's operational and sustainable strategy and the Group's operations manufactured 2,900 timber frame units in 2024.

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. We have also pledged our commitment to the Gangmasters and Labour Abuse Authority Construction Protocol and continue to be a Real Living Wage Employer.

Our supply chain involves local, national and international companies. Each region 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. Our supply chain onboarding process ensures that our suppliers and sub-contractors confirm compliance with the Modern Slavery Act, provide details of their own modern slavery policies and are aware of our modern slavery commitments and expectations.

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

During 2024 the Sustainability Committee established the Modern Slavery Sub-Committee. Its objectives are to make recommendations to the Sustainability Committee, relating to the effective management of modern slavery risks, improvements and challenges toward effective mitigation of modern slavery within the supply chain and performance against targets across the Group.

### 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 [www.vistrygroup.co.uk/policies-and-publications](http://www.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. One report was made to EthicsPoint in 2024, concerning a sub-contractor's workforce; the matter was investigated, and no evidence was identified to substantiate the report.

### 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 region 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

Our people are required to complete a dedicated modern slavery awareness training, which provides guidance on understanding modern slavery in the construction industry via our Learning Management System, Vistry Learn. An annual refresher is also included in the Group's annual mandatory compliance training. This also applies to new starters and the requirement is referenced in the Group's virtual onboarding module.

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.

## REVIEW OF 2024

In 2024 we:

- 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;
- Rolled-out a targeted modern slavery poster campaign across the Group's sites to increase individual awareness;
- Established a sub-committee to focus solely on modern slavery;
- Worked with our supply chain towards ensuring that our third-party workers are paid the Real Living Wage; and
- Audited literature, promotional material and employee awareness of both Modern Slavery and Speak-Up, and implemented further controls to ensure consistency of messaging across our entire estate.

## FURTHER STEPS

During 2025 we intend to:

- Continue to 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;
- 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

- The Internal Audit team plan to audit the internal controls supporting our approach to Modern Slavery to provide assurance on effective management of the associated risks.

Approved by the Board and authorised for issue by:



**Greg Fitzgerald**  
Chief Executive

Date: 14/05/2025

## VISTRY GROUP PLC COMPANIES AND SUBSIDIARY COMPANIES ON BEHALF OF WHICH THIS SECTION 54 MODERN SLAVERY STATEMENT IS MADE:

Vistry Group PLC	Vistry Partnerships Yorkshire Holdings Limited
Vistry Homes Limited	Countryside Partnerships Limited
Vistry Partnerships Limited	Countryside Properties (Housebuilding) Limited
Vistry Linden Limited	Countryside Properties (UK) Limited
Linden Limited	Millgate Developments Limited
Countryside Partnerships Southern Limited	Countryside Properties (WPL) Limited
Vistry Partnerships Yorkshire Limited	Countryside Properties (Strategic Land) Limited
Countryside Timber Frame Limited	

## VISTRY GROUP PLC JOINT VENTURE COMPANIES ON BEHALF OF WHICH THIS SECTION 54 MODERN SLAVERY STATEMENT IS MADE:

Opal Silvertown LLP
Linden (Basingstoke) Ltd
Gallions Developments 2A LLP
Countryside L&Q (Beaulieu Park) LLP
Acton Gardens LLP
Countryside Clarion (Eastern Quarry) LLP
Greenwich Millennium Village Limited
Bovis Homes Cambourne West LLP
Stanton Cross Developments LLP
Bovis Latimer (Sherford) LLP
Clapham Park (Metropolitan Countryside) LLP