



Modern Slavery and Human Trafficking Statement 2024/2025

Purpose of Statement

This statement is made in accordance with the Modern Slavery Act 2015 on behalf of Notting Hill Genesis and all legal entities that are part of our group. Please see our annual report and financial statements for a complete list of all our subsidiary organisations.

Organisation

We are one of the largest housing associations in London and the surrounding areas and are committed to doing all we can to prevent slavery and human trafficking in our organisation and supply chain. We have a zero tolerance for slavery and human trafficking.

Policies

We have a robust framework of policies in place to support detection and prevention of slavery and human trafficking. These policies include:

- Allocations and lettings
- Anti-bribery
- Anti-fraud
- Anti-money laundering
- Code of conduct for employees
- Code of conduct for contractors
- Equality, diversity, and inclusion
- Procurement
- Recruitment
- Safeguarding adults
- Safeguarding children and young persons
- Tenancy fraud and unauthorised occupants
- Whistleblowing
- Young people at work

Colleagues

We employ over 1,600 people and our employment policies and procedures ensure that all of our employees have the legal right to work and are employed in accordance with labour laws.

We empower our workforce to identify slavery and human trafficking through training and awareness programmes. If an employee were to become a victim of slavery or human trafficking, they would be able to access support through our independent and confidential employee assistance programme.

We consider the overall risk of slavery and human trafficking in our operations to be minimal. However, we are committed to staying alert and taking immediate action in the event of any compliance breach, including involving the appropriate authorities and applying lessons learned to prevent future incidents.

Residents

We recognise that some of our residents may be vulnerable to slavery and human trafficking. All our resident-facing staff receive safeguarding and modern slavery training on how to identify abuse and to take the appropriate action. Resident facing managers are required to attend a 1-day workshop as well as complete the basic training courses.

Supply Chain

Our supply chains include sourcing of goods, services and works for the development, delivery and maintenance of quality homes as well as corporate service requirements. Our supply chain is extensive with goods and services sourced directly, and indirectly from more than 1,400 suppliers; the vast majority of which are based in the UK. The volume of suppliers, focus on the construction sector, and high-level of indirect spend, which are our key supply chain risk factors for slavery and human trafficking.

In relation to procurement, in line with Government guidance on the pre-qualification of suppliers in a tender process, our tender questionnaires are based on the periodically updated *Procurement Specific Questionnaire (PSQ)* , aligned with the *Procurement Act 2023 (PA23)*.

Part 1 of the PSQ provides confirmation of core supplier information via the Central Digital Platform (CDP). This captures any Labour market, slavery and human trafficking offences, and provides for mandatory and discretionary exclusion grounds of a supplier or connected person, depending on the severity of the offence. Part 2 of the PSQ suppliers must submit their own (and their connected persons) exclusions information via the CDP. This may include whether any of the exclusion grounds apply, details of the incidents, and whether any mitigating actions have been taken.

Lastly Part 3 in the PSQ allows NHG to set specific conditions of participation which a supplier must satisfy to be awarded a public contract, which includes a section on "Tackling Modern Slavery in Supply Chains". This provides for an evaluation of suppliers Modern Slavery statements (or other relevant documents containing information of a similar type/level if not subject to the Modern Slavery Act 2015). To ensure that they have policies in relation to slavery and human trafficking as well as its due diligence processes in relation to slavery and human trafficking in its business and supply chains including the steps it has taken to assess and manage this risk.

. To enable standardisation of supplier due diligence checks, NHG has adopted the PSQ structure as a starting point to develop proportionate questions in the tender documents for lower value procurements..

Where appropriate, the Common Assessment Standard (CAS) is used as an alternative selection questionnaire for public works contracts, above the relevant regulatory thresholds, which includes the same mandatory and discretionary grounds for exclusion in relation to slavery and human trafficking as the PSQ.. Declarations are mirrored in our Supplier On-boarding process for new suppliers, to review compliance with the annual reporting requirements contained within Section 54 of the Modern Slavery Act 2015. This also addresses checks on low value suppliers that have been appointed in line with Financial Regulations.

Otherwise, our standard contract terms include conditions in respect of compliance with anti-slavery and human trafficking laws and policies as well as declarations that they will not engage in any activity, practice or conduct that would constitute an offence under the Modern Slavery Act 2015. This extends to suppliers' subcontractors and its supply chain to warrant compliance with anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015.

We work in partnership with our contractors, joint ventures, subsidiaries, and our suppliers during their contracting period with us to implement risk mitigation actions and address any concerns.

To mitigate the risk in our supply chain we conduct an annual audit of our top 100 suppliers with a turnover of more than £36 million which includes ensuring they have a published modern slavery statement. We also ask new suppliers to confirm they are not engaged in, or subject to any investigation related to, slavery or human trafficking. Our standard contracts include requirements for suppliers to reduce the risk of slavery and human trafficking in their businesses and supply chain during the life of their contract with us.

During this coming year we will be doing more to develop our supplier relationship management. We are developing our in-vendor life management procedures to support our identification and investigation activities.

Training

All staff are required to complete mandatory eLearning on Modern Slavery and Human Trafficking, with a refresher required at least every three years. In addition, guidance is available to support staff in identifying and assisting potential victims.

To strengthen our understanding of the risks associated with modern slavery and human trafficking—particularly within our procurement processes and supply chains—we are enhancing our training offer this year. We will work closely with designated champions across the organisation, equipping them with advanced tools and knowledge to help identify potential cases and understand the appropriate reporting procedures.

These champions will also provide direct support to colleagues who work closely with residents and contractors—groups identified through organisational risk assessments as being most likely to encounter signs of modern slavery or human trafficking.

Our Talent & Learning Team reviews this training every three years to ensure it reflects the latest legislation, best practices, and guidance. Should there be any significant changes in legislation or policy, the training will be reviewed and updated ahead of the scheduled review cycle. This training forms a core part of our organisation's mandatory learning requirements.

Approval

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 on behalf of Notting Hill Genesis and all legal entities that are part of our larger group. Please see our annual report for a list of our subsidiary organisations.

Approved by the Board for Notting Hill Genesis for the fiscal year ended 31 March 2025.

Signed:

A handwritten signature in black ink, appearing to read 'Ian Ellis', with a stylized, cursive script.

Ian Ellis

Chair

30 July 2025