

MODERN SLAVERY TRANSPARENCY STATEMENT

Wain Group Holdings Limited is the parent company of the Wainhomes group. Pursuant to s. 54 of the Modern Slavery Act 2015, this statement constitutes the Modern Slavery Statement of Wain Group Holdings Limited and other Wainhomes companies as specified below ("**Wainhomes**"), for the financial year ending 30 September 2021.

The Modern Slavery Act 2015 creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking ("**Modern Slavery**"). Wainhomes is committed to combatting all such forms of Modern Slavery.

ABOUT WAINHOMES

Wainhomes is a housebuilding and land and property business focusing on regeneration, commercial development and the promotion of mixed use schemes.

The housebuilding aspect of Wainhomes operates in three regions in the North West, Severn Valley and South West of England and is focused on delivering quality homes for customers.

WAINHOMES SUPPLY CHAINS

Wainhomes construction projects are developed through a combination of directly sourced materials and directly employed construction personnel and also through Wainhomes relationships with contractors who provide supplies and services (including labour). Significant supplies include, for example: ground works, bricks, fencing, roof truces, tiles and other building supplies. At times those supplies and services are subcontracted however, as set out below, Wainhomes' permission is required for any such subcontracting. Wainhomes uses a restricted number of labour providers to support the developments of its sites.

In addition to the supplies and services procured in relation to the development of sites, Wainhomes relies on office supplies and facilities supplies to its premises in Warrington, Bristol and Exeter.

Whilst the Wainhomes projects are UK based and the number of suppliers used by the group is limited, Wainhomes recognises that Modern Slavery is not a risk that is restricted to construction projects overseas and that supply chains extend globally.

POLICIES AND PROCEDURES

The policies and procedures that Wainhomes has to combat Modern Slavery in its housebuilding business are set out below.

Anti-Slavery and Human Trafficking Policy

Wainhomes is in the process of updating its suite of compliance policies and procedures and a part of that process will involve the introduction of an Anti-Slavery and Human Trafficking Policy. The policy will confirm Wainhomes' commitment to combatting all forms of Modern Slavery, require adherence by employees and suppliers and refer to the consequences of a breach.

Contractual controls

Wainhomes contractual terms contain a number of requirements which are relevant to reducing Modern Slavery risk. These include the requirement on contractors to obtain Wainhomes' consent prior to subcontracting, which allows due diligence to be carried out, and also the reservation of audit rights in respect of employment records of contractors. Wainhomes is in the process of reviewing those contractual provisions to increase protections in respect of Modern Slavery and expects to introduce revised standard terms shortly.

Due diligence of sub-contractors

Wainhomes conducts due diligence in respect of sub-contractors including checks of corporate and tax records and also to confirm that the sub-contractor maintains adequate policies and procedures in respect of health and safety. These compliance checks give Wainhomes a level of comfort in respect of the standing of the suppliers it works with. Wainhomes is currently considering introducing further checks and diligence in respect of its supplier base relevant to Modern Slavery risk.

Third party review

Wainhomes has engaged an external adviser to assist the group with assessing Modern Slavery risk and to further enhance Wainhomes' policies and procedures.

APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 30 September 2021 and has been approved by the board of Directors of the following Wainhomes companies.



Director for and on behalf of Wainhomes (North West) Limited

Date: 16/11/2020



Director for and on behalf of Wainhomes (South West) Limited

Date: 16/11/2020



Director for and on behalf of Wainhomes (Severn Valley) Limited

Date: 16/11/2020