

## **MODERN SLAVERY TRANSPARENCY STATEMENT**

Wain Group Holdings Limited is the parent company of Wain Homes Ltd. Pursuant to s. 54 of the Modern Slavery Act 2015, this statement constitutes the Modern Slavery Statement of Wain Group Holdings Limited and other Wain Homes companies as specified below ("Wain Homes"), for the financial year ending 30 September 2022.

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

### **ABOUT WAIN HOMES**

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

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

### **WAIN HOMES SUPPLY CHAINS**

Wain Homes construction projects are developed through a combination of directly sourced materials and directly employed construction personnel and also through Wain Homes 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, Wain Homes' permission is required for any such subcontracting. Wain Homes 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, Wain Homes relies on office supplies and facilities supplies to its premises in Warrington, Bristol, Exeter and Solihull.

Whilst the Wain homes projects are UK based and the number of suppliers used by the group is limited, Wain Homes 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 Wain Homes has to combat Modern Slavery in its housebuilding business are set out below.

#### **Anti-Slavery and Human Trafficking Policy**

Wain Homes 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 Wain Homes' commitment to combatting all forms of Modern Slavery, require adherence by employees and suppliers and refer to the consequences of a breach.

#### **Contractual controls**

Wain Homes contractual terms contain a number of requirements which are relevant to reducing Modern Slavery risk. These include the requirement on contractors to obtain Wain Homes' 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. Wain Homes 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**

Wain Homes 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 Wain Homes a level of comfort in respect of the standing of the suppliers it works with. Wain Homes is currently considering introducing further checks and diligence in respect of its supplier base relevant to Modern Slavery risk

### **Third party review**

Wain Homes has engaged an external adviser to assist the group with assessing Modern Slavery risk and to further enhance Wain Homes' 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 2022 and has been approved by the board of Directors of the following Wain Homes companies.



Director for and on behalf of Wain Homes (North West) Limited



Director for and on behalf of Wain Homes (South West) Limited



Director for and on behalf of Wain Homes (Severn Valley) Limited



Director for and on behalf of Wain Homes (West Midlands) Limited