

## **Modern Slavery and Human Trafficking Statement 2017**

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year ending 30th June 2017.

The statement sets down Inland Homes' commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

### **Organisation Structure and Supply Chains**

This statement covers the business activities of Inland Homes which are as follows:

- Inland Homes are an established land regeneration business.
- Geographic focus is on developing sites in southern England for residential and mixed use projects.
- Inland Homes sell private housing units and residential land plots, with currently over 6,600 land bank plots.
- The business had a Group revenue for the year ending 30 June 2016 of £101.9 million.
- The Group is managed through its Board of Directors, supported by a strong senior management team.
- Our supply chain (includes all main contractors, sub-contractors, consultants, service providers and other third party representatives).
- The Company only operates in England.

### **High Risk Activities**

The main activities which could be considered to be at higher risk of modern slavery or human trafficking is through labour provision in the delivery of sub-contractor trades through our onsite operations.

As a broader strategic objective the business is developing its in-house capability to "self deliver" our homes in addition to engaging external main contractors. This will see our direct supply chain increase, however will enable us to retain much greater control and management through direct contractual appointments.

Responsibility for the Company's anti-slavery initiatives is as follows:

1. Nishith Malde, Finance Director is responsible for creating and reviewing policies, which ensures it is an agenda item at main Board level. The process by which policies are developed is through recognition of new legislation, understanding the potential business risk and develop a process and set of activities which minimise business exposure.
2. Mark Snelling, Consultant, Safetymark Consultancy Services is a directly appointed third party advisor on Health, Safety & Environmental. Risk assessments in respect of business exposure to modern slavery and human trafficking would be undertaken through this resource.

3. All staff responsibility - Inland Homes encourages all staff to have an awareness, with specific emphasis on the project management and construction teams (viewed as higher risk) who are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

## **Training**

Inland Homes are looking to develop online training modules within the year for staff across multiple themes, it is our intention to include a module which addresses modern slavery and human trafficking within this.

## **Policies**

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

1. The Inland Employee Handbook - This is currently in the process of being prepared, the update will include a Code of Conduct and sets down the actions and behaviour expected of employees when representing the Company.
2. Corporate Social Responsibility (CSR) Policy - Inland Homes does not publish a separate CSR Policy however places significant emphasis on these responsibilities. As such it reports on these in our Annual Accounts (including but not limited to Health & Safety, Environmental, Community and Charitable Activities, Employee Involvement and Sustainability (where responsibilities in respect of the Modern Slavery Act will be reported).

## **Due Diligence Processes for Slavery and Human Trafficking**

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes:

- Updating existing policies and procedures to take account of the Modern Slavery Act.
- Reviewing contracts with existing and new suppliers. Where potentially high risk existing contracts are identified, these may be reviewed prior to renewal.
- Including in new contract appointments and supplier selection processes an obligation for suppliers to address the requirements of the Modern Slavery Act.
- If instances of concern are identified action is taken by the relationship manager, agreeing an action plan in respect of the supplier's working practices. Where a supplier fails to improve their performance in line with an action plan provided by us, the business can consider termination of the business relationship.
- Reviewing our employment terms and conditions for both agency and permanent employees.
- Making all relevant pre-employment checks prior to employing staff. We use fair and transparent recruitment processes and will ensure the recruitment agencies we work with comply with these requirements in the provision of agency staff.
- Encouraging 'whistleblowing' and the reporting of serious concerns related to our own activities or supply chain.

## **Key Performance Indicators**

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains. Key performance indicators for the financial year ending 30 June 2017 include:

- Modern Slavery and Human Traffic training module rolled out to all staff.
- Quarterly reporting by site teams of any suspected or proven incidents and actions taken in response.
- Awareness and review of any risk/evidence through monthly third party onsite Health, Safety and Environmental audits.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Executive Team and Board of Directors endorse this policy statement and are fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

**Nishith Malde**  
Finance Director  
December 2016