

Croudace Homes Group Limited – Modern Slavery and Human Trafficking Statement

We are fully supportive of the UK Government's efforts to combat slavery and human trafficking.

Organisation's structure and business

We are a housebuilding company based in the South East of England. Our main activity is the acquisition of development land; securing planning consent and technical approvals; construction and marketing of high quality new homes.

The Group is made up of the following principle companies:

- Croudace Homes Group Limited (Parent Company)
- Croudace Homes Limited
- Croudace Portland Limited

The Group has 264 employees working exclusively in the UK.

The Group has an annual turnover of c. £182m.

Our supply chains

The majority of the technical, professional, and managerial activities necessary in carrying out our operations are undertaken by directly employed staff. We offer remuneration and benefits packages well above minimum wage requirements, and amongst the best in the industry.

From time to time specialist consultancy services are contracted in from known and reputable companies based in the U.K.

All of the construction work on our sites is carried out by U.K. based contractors, engaged under the terms of a formal works order. Our usual approach is to operate with a limited pool of known trade contractors, many of whom have long histories with us and whose working practices reflect our own culture for the treatment and respect of their employees.

For certain elements of our building work we directly purchase materials and components from either specialist or general supply companies, again these are primarily U.K. based organisations.

For specific activities (forklift driver, handyperson, and general labourer) we employ individuals via Labour Agencies. We only use Agencies from a Preferred Supplier List. By regular checking we ensure proper payment arrangements are in place and that payments to individuals are in excess of National Minimum Wage requirements. All Agency employees have the benefit of our usual site safety policies and welfare facilities.

A copy of this statement together with our policy on Modern Slavery and Human Trafficking is brought to the attention of all our trade contractors, agencies and suppliers and included within their terms of engagement. Where applicable we request a copy of the contracting company's statements on this subject.

We set high standards for organisation and good housekeeping in all our workplaces, including our construction sites. This includes ensuring that suitable welfare facilities are provided at all times.

The safety of our workforce, directly employed and contracted, is our no. 1 priority, and is the first item for discussion on Board Agendas.

We operate a strict fair payment policy towards our contractors and suppliers.

In this way we believe our policies and procedures encourage our contractors and suppliers to act in an ethical manner in relation to the physical treatment of their own workforce.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Should any such incident come to our attention a zero-tolerance approach will be taken to modern slavery. We have in place a Whistleblowing Policy which encourages whistleblowers to come forward and voice any concerns they have – including in relation to slavery, servitude, forced and compulsory labour and human trafficking.

Due diligence, Code of Conduct for Contractors and Suppliers

For the reasons outlined above we consider that we are an extremely low risk company in this respect.

We accept however that the situation necessitates regular monitoring to ensure the position remains this way.

Training

All staff are made aware of our Modern Slavery and Human Trafficking policies as part of their induction training. All existing staff have completed a programme of awareness training, including whistle-blowing.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending December 2017.

Signed by:



Russell Denness, Group Chief Executive

Date: 31 May 2018