



## **MODERN SLAVERY STATEMENT**

### **INTRODUCTION**

The following statement by Pennyfarthing Group of Companies is published in accordance with the Modern Slavery Act 2015 (The Act) which sets out our commitment to preventing modern slavery and human trafficking in our group of companies and associated supply chains. This statement is published annually.

### **THE COMPANY**

The Pennyfarthing Group of Companies undertake residential housebuilding programmes and projects in the south of the UK. Our head office is based in New Milton, Hampshire with several development sites in and around the south of England.

### **OUR SUPPLY CHAIN**

Our supporting supply chain is wide ranging and includes the supply of building products and materials, directly employed staff, temporary trades/labour and permanent recruitment via agencies, consultancy services and subcontractors providing services, materials and labour.

### **DUE DILIGENCE**

The steps we have taken to mitigate the risks in relation to The Act in our supply chain is as follows:

#### **Building Products and Materials**

We procure most of our products and materials from UK based organisations where our contracts are based on agreed principles and where suppliers are required by law to comply with The Act. We do procure a small proportion of our products and materials from outside of the UK that may not have legally binding frameworks in place. Our terms & conditions specify that all suppliers must comply with relevant employment legislation in the countries in which they operate.

#### **Directly Employed Staff**

We verify that all directly employed staff have the right to work in the UK and all employees are aware of their terms and conditions of employment including working hours, holiday, pay and statutory entitlements via contracts and employee handbooks.

#### **Recruitment Agencies**

We operate a preferred supplier list when using temporary trades and labour on site, and we require those agencies to ensure their agency workers have the right to work in the UK and adhere all statutory employments rights making sure they are aware of

those rights. These terms also apply to all candidates put forward for permanent recruitment positions.

### **Sub-Contractors**

When tendering for sub-contractor services, our formal terms and conditions remind our subcontractors of our commitment to The Act and by entering into said contract they agree to uphold the same.

We will not engage with businesses considered unethical and encourage staff to remain vigilant to corrupt and/or unethical working practices and to report any concerns.

The following policies/procedures will be implemented, reviewed and/or updated where necessary to include provision of our approach and commitment to The Act.


- Whistleblowing Policy
- Recruitment and Resourcing Procedure

Our agreed procedures and practices are subject to continual review.

**This statement was approved by the Board of Directors.**

Name: Matthew Dukes

Signature:

A handwritten signature in black ink, appearing to be 'MD', written over a horizontal line.

Date: 7.2.23

Year ending January 2023