

Modern Slavery and Human Trafficking Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The Company has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships, to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

This statement is made on behalf of Chestnut Homes pursuant to section 54(1) of the Modern Slavery Act 2015 ('the Act') and constitutes our slavery and human trafficking statement for the financial year ended 31st October 2020 (2019/20).

Company Structure and business

Chestnut Homes is a family business, who directly employ around 70 employees and up to 350 sub-contract workers on our sites at any one time.

Our principal activities comprise acquiring developable land, obtaining planning permission and building high-quality homes within local communities. All of our operations and activities are UK based. Our vision is to be a leading local housing developer, by putting customers at the heart of everything we do.

We have an annual turnover in excess of £36m or more and operate solely in the UK.

Supply Chains

Our supply chains include a diverse sub-contractor labour force including ground workers and housebuilding trades, merchants, material suppliers, design and environmental consultants and various other associated trades and services connected with housebuilding. Procurement of housebuilding materials are predominantly sourced locally, materials and components are usually assembled and/or manufactured in the UK.

Our suppliers and subcontractors are responsible for compliance with their supplier relationships.

Relevant Policies

We will always aim to act with integrity across all of our business dealings, some of our existing internal policies and procedures are relevant to ensure that there is no slavery or human trafficking involved in any part of our business or supply chains.

Our relevant policies include:-

- Whistle-Blowing
- Harassment Policy and Procedure
- Bullying Statement and Procedure

- Equal Opportunities code of practice
- Anti-Bribery and Corruption Policy
- Ensuring all employment shall be voluntary
- The right to work in the UK checks when employment commences
- Provision of an employment contract confirming the employee's right to leave work and the ability to terminate employment upon expiry of reasonable notice
- Code of Conduct Policy

Risk Assessment and Due Diligence Processes

You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with our Whistleblowing Policy as soon as possible. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director. We continue to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Prior to taking on a new member of staff we ensure that we complete the necessary pre-employment checks to verify the workers' identity and eligibility to work in the UK. We would not employ those who are unable to provide us with such evidence.

The recruitment agencies we use are required to make the same checks before supplying a worker to us. All our employees are paid by bank transfer and we don't make payments into third party bank accounts thus minimising the risk of forced or compulsory labour. If we became aware of any potential issues with our staff, agency workers or sub-contractors we would investigate and if our concerns were founded immediately report to the police on 101. If a person was in danger then we would immediately ring 999. There is also a **confidential modern slavery helpline** where you can raise a concern in confidence – **08000 121 700**.

Measuring Effectiveness

We do not have key performance indicators specifically in relation to slavery or human trafficking as any instance would be expected to be a non-compliance, and breach of employment laws covered by our employment practices and the policies set out in our Employee Handbook.

Our information is very clear and highlights what to be alert for within the construction industry, and provides a helpline number for reporting any concerns in confidence. **This statement has been laminated and displayed, on all our own managed sites, in the welfare areas, accessible to all on site.** The Company Directors shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources to ensure that modern slavery is not taking place within the company or supply chains.

We recommend you familiarise yourself with the different types of modern slavery in construction. These can impact on our business directly, or through supply chain relationships that we may have with subcontractors or suppliers. Though not an exhaustive list, the most common types of modern slavery in construction are

- Human trafficking

- Forced labour
- Bonded labour
- Slavery of children.

Spotting workers who are at risk may arise at our recruitment or induction process. For example, an instance of a worker at risk could be if they have had their personal belongings or identification taken from them, or if other documents are being withheld. Our process includes checking documents and ID and will highlight any individuals unwilling to provide that information. An individual may also not have their own bank account, or may be found to have a common address with many other workers. These can also be indicators that need further checking.

Injuries, fatigue or poor physical health and a lack of adequate and suitable personal protective equipment can be an indication of modern slavery. If unchecked, they can lead to further risk of harm in the workplace. If we have someone at work who is not fit for work through exhaustion, injury or stress, or inadequate safety clothing they are more likely to incur further injury. This also increases the possibility of hazards that put other workers at risk.

Training on Modern Slavery and Human Trafficking

Our existing employees are made aware of the importance of ensuring that the Company is alert to the potential of slavery and human trafficking via this statement being issued. All new employees will be made aware during their Company Induction.

You are invited to comment and suggest ways in which we may improve. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

Compliance

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

David Newton
Managing Director

Signed


Print **DAVID NEWTON**

Date ... **12th April 2021**