

Modern Slavery Act 2015 and Human Trafficking Compliance Statement Statement of Intent

All entities within The Sovini Group are committed to promoting the highest standards of ethical business practice from our recruitment and employment activities through to the behaviours and procedural arrangements we expect from our supply chain partners. The Sovini Group incorporates the following companies:

- Sovini Limited (Parent Company)
- Sovini Charities Limited
- One Vision Housing Limited
- Pine Court Housing Association Limited
- Sovini Commercial Limited
- Sovini Development Limited
- Sovini Property Services Limited
- Sovini Trade Supplies Limited
- Sovini Construction Limited
- Sovini Homes Limited
- Sovini Land Acquisition Limited
- Sovini Waste Solutions Limited
- Amianto Services Limited
- Teal Scaffold Limited

This includes being vigilant to the human suffering caused by those involved in acts of modern slavery and human trafficking activities. We welcome the increased emphasis and need for positive action that the Modern Slavery Act brings to all the parts of our Group structure and those with whom we choose to do business.

Our aim is for continuous improvement in this area, and we will build on our existing strong emphasis on promoting employee welfare, stringent selection procedures and monitoring of our supply chain, through to our zero-tolerance stance for any form of discrimination or Human Rights breaches to achieve equitable outcomes for all.

The Sovini Group Structure and Business Activities

The Sovini Group brings together like-minded organisations from the 'non-for profit', charitable and commercial sectors in a mutually beneficial and collaborative business partnership. With the benefits of a number of shared central services, each Group entity retains independence whilst working towards commonly held codes of business practice, sound governance arrangements and a shared vision for 'a better future'.

Within the Group, current business activities include the provision of homes for rent, part-ownership, outright sale and associated housing management and maintenance services. We also have businesses which deliver all aspects of property maintenance and repair, construction and land acquisition services and building materials supply both inside and outside the Group.

Our Supply Chain Management Arrangements

Any supplier or sub-contractor that we choose to work with is subject to a comprehensive assessment process prior to their appointment, to ensure their operations are in line with our ethical business standards. This includes:

- Disbarring any company from the approved supplier list for any prosecutions or judgements for breaches of the Procurement Act 2023, Equality Act 2010, Human Rights Act 1998 or any court or industrial tribunal, including modern slavery or trafficking offences
- Requesting copies of Equality Inclusion and Diversity Policies and related documents

Once approved, suppliers and sub-contractors are subject to regular monitoring and review including internal cross-functional working, requesting staff to complete supplier performance reviews to ensure they maintain the standards required and are removed if breaches are discovered, with relevant investigation agencies informed accordingly.

In parts of our Group that are involved in importing timber products we also maintain full 'Chain of Custody' registrations to ensure the products supplied have sound environmental provenance and there are no child labour or worker exploitation issues.

Our Organisational Response

As part of comprehensive pre-employment checks we ensure all prospective employees have indefinite leave to remain within the UK and appropriate permits to work, where these are required.

If we were to encounter any incidents where papers are not in order or there is a suspicion that the applicant may be subject to trafficking or modern slavery arrangements, we will make alerts to the relevant enforcement agencies whilst offering support to the individuals concerned.

Over the period 2025/26 we have made improvements to our supply chain monitoring for greater cross-checking of new entrants to the approved supplier list, in-line with 'Transparency in Supply Chains (TISC): statutory guidance requirements'.

We have also improved procedures and guidance available to all managers to monitor agency / temporary workers and carry out appropriate identification checks on eligibility to work in the UK.

Each company within our Group structure has in place a comprehensive suite of Human Resources Policies (copies available on request) to protect workers and ensure fair and consistent treatment during their time of employment with Sovini companies. We also maintain a comprehensive Group-wide 'Equality, Diversity and Inclusion', 'Wellbeing' and 'People Strategies' which have employee welfare as a cross-cutting core theme.

All our organisational Policies are subject to an Equality Impact Assessments when they are being developed or reviewed, and we will consider any implications they have in relation to the Modern Slavery Act compliance requirements.

We employ a number of 'Group Champions' to monitor our compliance arrangements and ensure we strive for continuous improvement in our response to modern slavery and trafficking issues, alongside responsibility for reporting on Corporate Social Responsibility actions.

We have developed a multi-team 'Equality, Diversity and Inclusion Steering Group', a staff-led equalities forum (Diversity Leaders) and a dedicated section of our accessible employment engagement application, all of which regularly reference and raise awareness of modern slavery issues. We provide annually refreshed Modern Slavery training to all our Managers at our Managers Forum, focusing on supply chain and employment risks and mitigations, along with improvements to ensure our managers promote ethical and responsible behaviours.

We have incorporated modern slavery and trafficking awareness into our rolling programme of 'Safeguarding Training' that is provided to all front line Sovini staff, including signs of danger and mechanisms for reporting. Over 2025/26 we have also extended the range of 'E-learning' resources that staff can access at any time, to specifically cover Modern Slavery Awareness.

Modern Day Slavery signposting details are included (telephone number and website address) under the Safeguarding information page in our Customer Relationship Management System.

We attend regional meetings which regularly use national referral mechanisms to report concerns in regard to children and adults being trafficked, particularly in regard to drug supply and child sexual exploitation.

If, during the course of day-to-day working activities, Sovini Group employees are made aware of a suspected incidence of modern slavery or human trafficking, their immediate response will be to inform the Police on 101 or as a 999 call if victims are in immediate danger. This applies equally to activities associated with other businesses that Sovini Group partners work with in community settings.

If One Vision Housing or Pine Court Housing Association tenants are involved, then our Community Safety Team would take up the case in terms of investigating / supporting / enforcement.

Where there are suspicions that companies / organisations Sovini Group members work with are involved in organised modern slavery or trafficking, these concerns will be forwarded on to the Group Champion (procurement) who will coordinate a response to the National Referral Mechanism for advice and guidance.

Planned Actions

Having already incorporated the dangers of modern slavery and trafficking into our Risk Registers, our Boards of Management will continue to receive annual updates on modern slavery initiatives, and this information will be factored into future resource planning.

To further improve our reporting and public awareness of our stance on Modern Slavery issues, it will also be incorporated into our annual 'Environmental, Social and Governance' Report produced by the Registered Providers of Social Housing within our Group.

This Compliance Statement will be reviewed annually to ensure it remains compliant with the Modern Slavery Act 2015 and to promote continuous improvement across the organisation, with approval at Board level.

This policy is fully endorsed by myself and the Executive Management Team.

Signed:



Reviewed: 21/04/2026

Roy Williams

Group Chief Executive Officer