

## Modern Slavery Act Transparency Statement – 2023

### Introduction

This statement has been prepared in accordance with the Modern Slavery Act 2015 and has been made in respect of Vistry Group PLC and its subsidiary and joint venture companies, including those listed at the end of this statement (together 'Vistry Group') for 2023.

At Vistry Group, we recognise that modern slavery can occur in the construction industry, and it is a risk to our business. We operate an Anti-Slavery and Human Trafficking Policy ('Policy') which outlines our zero-tolerance approach to modern slavery and human trafficking and supports our efforts to combat modern slavery.

### Our business & supply chain

Following the combination with Countryside Partnerships PLC in November 2022, Vistry Group updated its strategy in 2023 to focus its operations on its industry leading Partnerships business. Vistry Group now operates solely as a Partnerships business, focused on being a responsible developer, increasing the supply of affordable housing across the country. Vistry Group's purpose as a responsible developer is to work in partnership to deliver mixed tenure housing and we consider our highly valued supply chain as key business partners. Our business operates through 26 business units and delivers high quality new homes across multi-tenures including affordable, private rental and private for sale homes, and plays a leading role in urban regeneration. Vistry Group re-opened and delivered more than 300 units in 2023 from our Vistry Works, East Midlands timber frame manufacturing plant, manufacturing timber frames for Vistry's business units across the country.

Vistry Group continues to partner with Supply Chain Sustainability School and is a member of the Modern Slavery Engagement Programme which aims to increase awareness and provide guidance and training to our supply chain. In addition, Vistry Group has pledged its commitment to the Gangmasters and Labour Abuse Authority Construction Protocol and continues to be a Real Living Wage Employer.

Our supply chain involves local, national and international companies. Each business unit is responsible for the sourcing and supply of goods and services to each of their development sites. We maintain a number of Group-wide deals with national suppliers whose products or services are required to be used across our developments.

Vistry Group complies with all relevant employment laws and require our sub-contractors, suppliers and wider supply chain to also confirm compliance.

During 2023 the Sustainability Committee was established, chaired by the Chief Operating Officer and includes participation of a Non-Executive Director and members of the Executive Leadership Team ('ELT'). Its objective is to make recommendations to the ELT and oversees the Group's approach to eliminating modern slavery from the business.

### Policies

Our Policy applies to all staff and is incorporated into our agreements with both sub-contractors and suppliers. The Policy outlines our zero-tolerance approach to slavery and human trafficking. It also sets out what actions individuals should take if they are concerned that slavery or human trafficking is taking place in our business or supply chain. To ensure that the risk of slavery or trafficking is prevented, we will engage with sub-contractors and suppliers to require that they improve their practices where concerns are identified.

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#### The Policy is complemented by our:

- "Speak Up" whistleblowing policy;
- Anti-bribery and corruption policy;
- Anti-fraud policy;
- Diversity and inclusion policy;
- Ethical code of conduct policy; and
- Health, safety and welfare policy.

Our Group policies are reviewed on an annual basis. Copies of our policies are available on our website at: [www.vistrygroup.co.uk/policies-and-publications](http://www.vistrygroup.co.uk/policies-and-publications)

Our SpeakUp hotline is independently operated by EthicsPoint and can be used to report any concerns of modern slavery. There were no reports of modern slavery in the Vistry Group made to EthicsPoint in 2023.

### Due diligence

All of our contractors are subject to due diligence via our onboarding process which ensures that our suppliers and sub-contractors have an awareness of our modern slavery commitments, along with our expectations.

The onboarding process involves a face-to-face meeting between our site teams, commercial teams and the relevant contractor to discuss contract orders and Vistry Group policies, and how they are best implemented. If any concerns are raised, then further clarification may be sought. We require our Group suppliers to confirm their understanding of our Modern Slavery policy and provide copies of their own modern slavery policies.

Suppliers which are new to Vistry Group following the combination with Countryside Partnerships had been through Countryside Partnership's supplier approval process, which involved checks for modern slavery policies. A review of these suppliers will form part of our integration programme.

We meet regularly with our suppliers to review their performance and, if necessary, raise matters of concern.

## High risk areas

The construction industry generally can include areas of high risk, with a number of job roles which have a low skill requirement and provide potential opportunities for the exploitation of individuals.

The materials and goods that make up our homes may include raw materials from, or may be assembled in, countries that are at high risk of slavery and/or human trafficking.

Each business unit is responsible for procuring goods and services for the developments in their area. This often means working with local businesses which may not be aware of the potential for slavery and human trafficking.

## Training

Since the beginning of 2023, our people now undertake mandatory annual Modern Slavery training via our Learning Management System, Vistry Learn. This applies to new starters, with an annual refresher. The Group's virtual onboarding module also references this requirement.

Our people also have access to a dedicated Modern Slavery Awareness training page on our Group intranet, which provides guidance on understanding modern slavery in the construction industry, how to spot the signs of modern slavery, contact details for relevant agencies and details of our SpeakUp whistleblowing hotline.

## Review of 2023

### In 2023 we:

- Implemented a mandatory modern slavery training module on the Group's learning management system, Vistry Learn;
- Maintained our dedicated Modern Slavery Awareness intranet page, which provides guidance on understanding modern slavery in the construction industry, how to spot the signs of modern slavery, contact details for relevant agencies and details of our SpeakUp whistleblowing hotline;
- Rolled-out a targeted modern slavery poster campaign across the Group's sites to increase individual awareness;
- Worked with our supply chain towards ensuring that our third-party workers are paid the Real Living Wage; and
- Audited literature, promotional material and employee awareness of both Modern Slavery and Speak-Up, and implemented further controls to ensure consistency of messaging across our entire estate.

## Further steps

### During 2024 we intend to:

- Embed effective integration of our Policy throughout the enlarged Vistry Group following our combination with Countryside Partnerships;
- Continue to assess the Group's performance against the CCLA Find It, Fix It, Prevent It Initiative indicators;
- Continue to work with our supply chain so that all of our third-party workers are paid the Real Living Wage;

- Continue to monitor how effective we have been in ensuring that slavery or human trafficking is not taking place in our business or supply chain by measuring against our adopted KPIs.

Approved by the Board and authorised for issue by:



Greg Fitzgerald  
Chief Executive

16/05/2024

## VISTRY GROUP PLC COMPANIES AND SUBSIDIARY COMPANIES ON BEHALF OF WHICH THIS SECTION 54 MODERN SLAVERY STATEMENT IS MADE:

Vistry Group PLC	Vistry Partnerships Yorkshire Holdings Limited
Vistry Homes Limited	Countryside Partnerships Limited
Vistry Partnerships Limited	Countryside Properties (Housebuilding) Limited
Vistry Linden Limited	Countryside Properties (UK) Limited
Linden Limited	Millgate Developments Limited
Countryside Partnerships Southern Limited	Countryside Properties (WPL) Limited
Vistry Partnerships Yorkshire Limited	Countryside Properties (Strategic Land) Limited
Countryside Timber Frame Limited	

## VISTRY GROUP PLC JOINT VENTURE COMPANIES ON BEHALF OF WHICH THIS SECTION 54 MODERN SLAVERY STATEMENT IS MADE:

Opal Silvertown LLP
Linden (Basingstoke) Ltd
Gallions Developments 2A LLP
Countryside L&Q (Beaulieu Park) LLP
Acton Gardens LLP
Countryside Clarion (Eastern Quarry) LLP
Greenwich Millennium Village Limited
Bovis Homes Cambourne West LLP
Stanton Cross Developments LLP
Bovis Latimer (Sherford) LLP
Clapham Park (Metropolitan Countryside) LLP