

# MODERN SLAVERY STATEMENT

The Modern Slavery Act 2015 introduced an obligation on organisations to produce an annual statement of the measures taken to ensure that there is no modern slavery (including human trafficking) taking place within an organisation or its supply chain.

## **Avant Homes' structure and business**

The Avant Homes Group (the “Group”) is one of the UK’s leading privately-owned housebuilders operating in Midlands, North of England and Scotland. We have offices in each of these regions and at time of preparation, the Group employs 545 employees.

At Avant we are committed to driving unethical practices out of the supply chain, including by taking appropriate and proportionate steps to mitigate the risk of modern slavery and human trafficking occurring both within our own business and our supply chain.

## **Our supply chain**

We have a supply chain which comprises suppliers and sub-contractors engaged from major national corporates, regional companies, small and medium enterprises and local businesses.

Our suppliers and sub-contractors may in turn source services and goods from other suppliers and sub-contractors, a small proportion of which may be sourced from outside the UK.

## **Our policies**

Corporate responsibility is firmly embedded within the Group’s culture, and the Group is committed to full compliance with all applicable legal and regulatory requirements, with due regard to recognised best practice. The Group also seeks to ensure that its suppliers and business partners uphold standards and values consistent with its own.

The Group has established a robust and comprehensive framework of policies, procedures and contractual obligations designed to mitigate the risk of modern slavery and human trafficking within its operations and across its supply chain. This framework encompasses recruitment and employment practices, arrangements for the reporting of improper or unethical conduct, codes of ethical behaviour, health and safety standards, and procurement policies. These policies and controls are subject to regular review and enhancement to ensure they remain appropriate, effective, and responsive to evolving risks relating to modern slavery and human trafficking.

## **Due Diligence**

As part of the Group’s initiatives to identify and mitigate risk, it continues to review key areas across its existing business as well as supply chain. We have carried out a periodical review of our internal policies and have undertaken a due diligence to ensure that our suppliers and sub-contractors are fully accountable for compliance with the legislation. We build long-standing relationships with our suppliers and sub-contractors and make clear our expectations to our business partners of the importance of adhering to the highest standards of corporate responsibility.

## **Risk Assessment**

Although the Group does not operate in, or directly source materials from, high-risk markets, such as emerging economies, we expect all of those in our supply chain and our contractors to comply with our values. This includes those businesses which do not have an annual turnover of over £36 million who are not covered by the Modern Slavery Act, to ensure that the highest levels of compliance are embedded across the whole supply chain. This is demonstrated by the Group’s requirement to include anti-slavery provisions in all new service and goods contracts entered into.

We operate a centralised procurement team who source materials from UK based organisations who are required to comply with UK laws on forced labour. We periodically review Group policies and as part of this ensure that Modern Slavery has been carefully considered. This includes looking at subcontractor terms and conditions and:

- Ensuring the policy does not place unnecessarily difficult or high pressure demands which would result in a subcontractor being tempted to breach their modern slavery obligations.
- Checking and amending where necessary all types of subcontractor terms and conditions to ensure that it is a requirement of their appointment that they comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including the Modern Slavery Act 2015.
- Ensuring that a breach of any anti-slavery and human trafficking laws by the subcontractor would entitle the Group to terminate business with them, therefore demonstrating the importance the Group places on preventing modern slavery.
- Ensuring any new contracts or agreements entered into that fall outside the Group's usual terms and conditions contain a clause ensuring compliance with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including the Modern Slavery Act 2015.

We undertake stringent and extensive due diligence checks when recruiting staff to ensure that all employees have the right to work in the UK before employment commences. This extends to the use of agency labour where recruitment takes place through reputable agencies operating on a regional or national level and which are required to have procedures in place to minimise the risk of recruiting forced or compulsory labour. Centralised agency recruitment allows us to better monitor usage and compliance and to assist the Group across its regions.

We also undertake extensive pre-qualification checks prior to appointing suppliers and sub-contractors to work with the Group.

The Group also has a whistleblowing policy in place where concerns about illegal acts can be reported on a confidential basis. This encourages individuals to raise concerns with confidence, and we are pleased that during the last financial year, we have had no incidences of whistleblowing regarding modern slavery.

As part of the Group's ongoing programme of review, we may also review or reconsider additional policies, procedures and requirements if appropriate.

### **Policy effectiveness and monitoring**

We operate within a framework which mitigates the risk of slavery and human trafficking in any part of our business or supply chain by ensuring:

- a pre-qualification process for all suppliers and sub-contractors is applied
- revised terms and conditions of purchase and sub-contract are available for issue to all suppliers and sub-contractors
- Group level oversight of the recruitment process and control of the payroll system
- that reputable agencies are used for the appointment of temporary and agency labour by each regional business

### **Training**

During the last financial year, the Group continued to encourage employees to enhance their knowledge and awareness across a range of areas through its online career and personal development platform. This platform is available to all employees and includes anti-slavery training modules, which may be accessed at any time

### **Progress during the previous financial year**

In summary, during our last financial year we have had no suspected incidents of modern slavery reported through our internal confidential whistleblowing scheme.

**Board approval**

This is Avant Homes' statement on slavery and human trafficking under section 54 of the Modern Slavery Act 2015 for the financial year ending 30 June 2025, which has been produced in line with the guidance issued by the Home Office under the Act. This statement has been prepared on behalf of all subsidiary organisations within the Group and has been formally adopted by all such subsidiaries as their own statement for the purposes of section 54, including, in particular Avant Homes Group Limited, and the core trading subsidiaries: Avant Homes (England) Limited, Avant Homes (Scotland) Limited and Avant Homes Limited.

This statement was approved by the Avant Homes Group Board on 4<sup>th</sup> February 2026 and will be reviewed and updated, as appropriate, on an annual basis.

*Jeff Fairburn*

***Group Chairman***