

## **WALES & WEST HOUSING**

### **ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Wales & West Housing Group (WWHG) to prevent modern slavery and human trafficking in our business and supply chains for the financial year ending 31 December 2025. It covers Wales & West Housing and its subsidiary undertakings.

#### **Introduction**

Modern slavery and human trafficking occur in both developed and developing economies and across multiple business sectors. The Group maintains a zero-tolerance approach to slavery, servitude, forced labour and human trafficking. A commitment exists to raising awareness and understanding of modern slavery and to eliminating the practice from all supply chains through responsible working relationships with partners and suppliers.

#### **Structure and supply chains**

The Group is a not-for-profit social housing provider operating solely in Wales. Services are delivered to more than 20,000 people, supported by over 600 employees, with the Group owning and managing over 12,500 affordable homes across 13 Welsh local authority areas. These include dedicated housing for older people and supported solutions for residents with a range of needs. The overarching purpose is to achieve strong, sustainable growth that improves lives, homes and communities.

Procurement activity is focused on sourcing within Wales wherever practical, with consideration given to local and ethical manufacture through a “buy right” approach. Principal development contractors, property services contractors and suppliers contribute to social value and community benefits aligned to the Group’s Making a Difference framework.

The Group is committed to paying the Living Wage and undertakes regular reviews of employment terms to ensure compliance with relevant legislation. Principal contractors are required to demonstrate progress toward Living Wage accreditation during procurement and contract review processes.

Role-based e-learning is provided to ensure that relevant staff understand the risks of modern slavery in service delivery and supply-chain management. Government guidance on identifying and supporting potential victims is accessible to all employees. Procurement-specific training incorporates assessment and due-diligence procedures based on ethical requirements.

Since 2019, the Group has been a signatory to the Welsh Government’s Code of Practice: Ethical Employment in Supply Chains (COP). An in e-learning COP tool will be available to all staff, and an external whistleblowing mechanism is on the Group’s website to enable third-party reporting.

The Group acts with integrity in all business relationships and maintains systems and controls designed to prevent modern slavery within its supply chains. The Group does not support or engage with any business known to be involved in modern slavery. Trading relationships are maintained only with organisations that comply with this Statement or demonstrate clear progress toward compliance. Contracts may be terminated with immediate effect where modern slavery offences are identified within a contractor’s operations or supply chain.

## **Risk Assessment and due diligence**

To identify and mitigate risk WWHG continues to adopt the supplier qualification process to define legislative and ethical requirements, enabling the evaluation and assessment against COP commitments. WWHG staff have guidance and supporting documentation to assist with internal process. Questions targeted at slavery and human trafficking risk, child labour protection and ethical employment practices are considered as part of our procurement process. The supplier qualification process encourages suppliers to sign up to the COP not only does this raise their awareness of the requirements of the Act and COP it also emphasises the importance WWHG places on being able to evidence compliance.

The implementation of the procurement framework ensures that systems and processes are in place to assess and provide reassurance that WWHG, suppliers/contractors, sub-contractors and supply chains are legally compliant. In addition, the process sets an expectation for suppliers to implement due diligence procedures for its own supply chain and subcontractors in alignment of the Code of Practice and to ensure that WWHG work with suppliers whose values are aligned.

## **Policies on modern slavery**

No issues relating to modern slavery have been identified within the Group's operations or supply chains. The following policies support compliance and early identification of potential concerns:

- Employee Code of Conduct
- Whistleblowing Policy
- Anti-Fraud Policy and Procedure
- Financial Regulations
- Safeguarding of Adults & Children Policy
- Ethical Employment Policy

## **Governance, approval and review**

This statement is made under Section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human-trafficking statement for the financial year ending 31 December 2025. The Group's consolidated turnover exceeds the statutory £36m threshold for reporting.

The Statement has been approved by the Group Board and will be reviewed and updated annually.

Signed



Peter Harding  
Chair  
Wales & West Housing

Signed



Anne Hinchey  
Group Chief Executive  
Wales & West Housing

Date: 23 April 2026