

# 2024/25 Modern *Slavery Statement*

Accent

This statement sets out Accent Group's commitment to preventing *human trafficking, slavery, servitude and force or compulsory labour* in all its business activities and within its supply chains.

**It outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2015 (MSA). This statement applies to the financial year ending 31 March 2025.**

## **Organisational structure**

Accent Group Limited is the parent company of the group and is a non-asset-owning Registered Provider of Social Housing. Accent Group Limited has one direct subsidiary company: Accent Housing Limited, which is an asset-owning Registered Provider of Social Housing. Accent Housing is a national social housing provider, owning and managing circa 22,053 homes in England. Accent Housing Limited (AHL) is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014. It is also a registered provider of social housing with the Regulator of Social Housing.

Accent Housing Limited has two further subsidiary companies: Accent Homemade Limited which is the vehicle for overseeing the funding associated with development schemes and Accent Capital plc which is a company set up specifically for the oversight and administration of our listed bond financing. All subsidiary companies are wholly controlled within the group structure.

Our modern slavery statement applies to the whole Group, and all parts of the Group are expected to minimise the risks of slavery and human trafficking in their business supply chains. We have taken steps to satisfy ourselves that the supply chain for AGL is satisfactory in terms of meeting the requirements of the MSA, and also meeting any formal requirements that we set out for our suppliers.

## **Compliance responsibility**

Responsibility for compliance with the MSA rests at the highest level with our Board of Management, with operational compliance responsibility assigned to the Head of Procurement and Supply.

Accent Group is committed to dignity at work and fair treatment of all colleagues. Preventing, detecting and reporting concerns about modern slavery, is the responsibility of everyone who works for us.

## **Our customers and properties**

We believe that every person has the right to live in a home where they are free from harm and feel safe. As a landlord we have a duty of care to respond, protect and support people who may find themselves in vulnerable / high risk situations and circumstances and have the necessary policies and procedures in place to help us do this. We work with people, multi-agency partnerships and organisations where needed to prevent and reduce both the risks and experience of abuse or neglect.



## Our policies

We operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

### Dignity at Work Procedure

Our Dignity at Work Procedure provides colleagues with the necessary guidance to carry out their work in the right way and reflect our core values and expected behaviours. Our procedure makes it clear that Accent have a zero tolerance in relation to discrimination, harassment, victimization, acts of aggression, or sexual misconduct.

### Employee Handbook

Our values and behaviours are at the heart of everything we do and therefore we expect all employees to live by these throughout every aspect of their work. Should an issue arise, colleagues will refer to our policies and procedures to manage the situation.

### Equity, Diversity and Inclusion Policy

We are committed to creating a dynamic and inclusive working environment - where all colleagues feel valued for who they are, enabling them to thrive at work.

### Procurement policy

We expect our suppliers to have the same high standards as we impose on our own business operations. Our procurement policy and supporting procedures contain checks and controls designed to help us verify that any potential suppliers that are subject to the MSA are committed to making sure that slavery and human trafficking is not taking place within their own supply chain.

### Safeguarding Policy, Anti-social Behaviour & Hate Crime Policy and Domestic Abuse Policy

Our policies and supporting procedures highlight the potential risks and how to report concerns.

### Talent Acquisition (Recruitment) Policy

We operate a robust recruitment policy which includes conducting checks on all prospective colleagues to verify that they are eligible to work in the UK. Certain roles also require a Disclosure and Barring Service (DBS) check where colleagues may be working with vulnerable people.

We have an in-house Talent & Resourcing Manager who co-ordinates recruitment activities across our organisation, developing our processes and bringing best practice into the organisation.

### Whistleblowing policy

We operate a whistleblowing policy so that all colleagues know that they can raise legitimate concerns about how colleagues are being treated, or practices within our business or our supply chain, without fear of reprisal.

### Risk assessment

We carry out an annual review of our approved supplier list to determine whether any suppliers carry a greater degree of risk due to the type of goods or services they provide or due to their geographical location. Our supply chain and highest risk areas mainly consists of services and supplies for our repairs maintenance programmes and building development activities. We do not have any supply chain outside the United Kingdom.

We operate a centralised supply chain using a 'purchase to pay' system which requires the use of pre-approved suppliers. This means that there are rigorous controls in place prior to committing to expenditure and clear visibility, enabling us to carry out retrospective checks on expenditure.

### Due diligence

We carry out due diligence on all new suppliers before allowing them to become an approved supplier:

- ▶ All new suppliers are required to declare that they comply with all elements of the MSA, as far as it applies to them.
- ▶ For formal procurement exercises we follow Government best practice guidance and if applicable require potential suppliers to complete an MSA questionnaire as part of the competition process confirming that they have made sufficient checks on their colleagues and that human trafficking is not taking place within their business and within their supply chain.

We include provisions in our standard contract terms and conditions requiring suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains. We may terminate a contract at any time should any instances of modern slavery come to light.

We carry out an annual audit of compliance with the MSA. We focus our assessment on high risk areas of our supply chain. Annually on the anniversary of their onboarding, suppliers are asked to complete a questionnaire to assess what actions they are taking to safeguard their own businesses and supply chains from the risk of modern slavery. We assess any evidence of non-compliance and will take appropriate remedial action against any supplier that does not provide adequate assurance that they comply with the provisions of the MSA.

### Key performance indicators

During this financial year, we have not identified any concerns that slavery and/or human trafficking may be taking place within our business or supply chain.

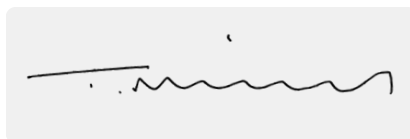
### Training and awareness

All colleagues receive training regarding the risks of modern slavery as part of our annual mandatory safeguarding training which includes human trafficking. New starters receive this as part of their onboarding and induction training, it is then refreshed on an annual basis. The training sets out how to identify at risk groups, signs of exploitation and how to report concerns. We also raise awareness of modern slavery issues by circulating information to our colleagues around the basic principles of MSA.

We have an in-house EDI specialist who supports our people team and leadership in delivering training based on current legal guidance and industry best practice, facilitates awareness sessions, and updates toolkits.

### Approval

This statement was approved by Accent Group Limited Board on 23 July 2025.



**Tom Miskell**  
Chair

Accent Group  
Limited