



## **Countryside Properties PLC**

### **Modern Slavery Statement for the year ended 30 September 2020**

#### **Introduction**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the 'Act') and sets out the steps that Countryside Properties PLC, its subsidiary companies and their relevant joint ventures (together 'Countryside') have taken and are continuing to take to detect and combat modern slavery and human trafficking in all parts of Countryside's business and supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Countryside has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chain.

#### **An overview of our organisation**

Countryside is a leading UK home builder and urban regeneration partner, operating in and around London and the South East of England, the North West of England, the Midlands and Yorkshire. Countryside is divided into Housebuilding and Partnerships divisions, each with separate management structures, supported by several functions that are centralised at the Group head office. Countryside operates only in the UK.

#### **1. Our supply-chain**

Our supply chain consists of hundreds of third party suppliers, contractors and sub-contractors on whom we rely to execute our projects, through the supply of goods and services. The suppliers vary in size from large corporations to individual tradesmen. The supply chain is predominantly UK-based, with some materials suppliers based in Europe.

Countryside operates a centralised materials procurement team, who control a database of all Countryside suppliers on behalf of the business divisions. This database consists of national and regional companies either sourced centrally or regionally dependent upon location and market conditions. Procurement is then managed locally from the approved database by the business divisions. Due diligence as to their compliance with Countryside policies and the maintenance of the database is managed by the central procurement team.

#### **2. Our higher-risk areas**

Many of Countryside's suppliers, contractors and sub-contractors are smaller businesses and are not required in law to make formal declarations relating to the Act. Countryside recognises that these suppliers/contractors, along with their suppliers and sub-contractors (including those outside the borders of the United Kingdom) present a higher risk to Countryside's business in relation to the Act. A Commercial Group, including Commercial Directors from each Division and led by one of the Divisional CEOs, also regularly reviews these particular types of supplier to assess the risk of modern slavery and have determined that the areas of highest risk relate to the provision of staff for contract cleaning, security staff and dry lining.

With regard to materials used in construction, there is a risk of modern slavery in the upstream supply chain where materials used by Countryside are procured from suppliers outside the UK and Europe, where employer and human rights legislation is less stringent.

### **3. Countryside's policies**

We operate a number of internal policies which require that we conduct business in an ethical and transparent manner. These include:

- Anti-slavery policy - which sets out Countryside's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Anti-Bribery and Corruption policy – which sets strict limits for the giving or receiving of gifts or hospitality and requires transparency for all employees through quarterly disclosure.
- Whistleblowing policy – which facilitates a third-party confidential line, monitored by SafeCall, in cases where an individual (whether an employee or contractor) discovers information which they believe shows serious malpractice or wrongdoing within the Company (the individual is able to disclose this information without fear of reprisal).
- Recruitment policy – which includes the requirement to conduct eligibility checks for the right to work in the UK for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Code of Conduct - which explains the manner in which all Countryside employees and agents must behave and how we expect our suppliers and contractors to act.

#### **Actions taken to combat modern slavery**

##### **1. Obligations on our suppliers – contractor assessment**

Countryside operates a supplier policy and maintains a preferred supplier list. We conduct pre-qualification due diligence on all new suppliers before allowing them to become a preferred supplier (the 'PQQ Process'). Countryside's Modern Slavery & Human Trafficking policy forms part of our contract with all new suppliers and they are required to confirm that no part of their business operations contradicts this policy. We reserve the contractual right to terminate any supplier contract in the event of breach of this requirement.

Given that many of Countryside's suppliers are long-standing, we have also written to all such suppliers asking them to make the same confirmations to us that we require from new suppliers.

The confirmations we require from all preferred suppliers as part of the PQQ Process are:

1. They have taken steps to eradicate modern slavery within their business;
2. They hold their own suppliers to account over modern slavery;
3. They pay their employees at least the national minimum wage / national living wage (as appropriate); and
4. We may terminate the contract at any time should any instances of modern slavery come to light.

##### **2. Contract terms**

Our standard supplier terms include bespoke robust anti-modern slavery provisions (including an obligation on our suppliers to obtain similar commitments from their suppliers).

##### **3. Training and awareness**

We conduct periodic training for all of our procurement/buying/construction teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. Refresher training will take place at regular intervals and all new managers with recruitment responsibility receive training in this area. Training is also available to all employees on Countryside's learning portal.

Periodically, we run awareness programmes to reinforce Countryside's zero tolerance approach to modern slavery. This includes posters, fliers, intranet notices and tool box talks across the entire business to make all workers aware of the warning signs of modern slavery and how to report these internally so that they can be investigated.

Site inductions for all workers on our construction sites include checking the right to work.

#### **4. Engagement with our supply chain partners**

We have recently completed a 'Brexit' survey with all of Countryside's principal suppliers and sub-contractors, one purpose of which was to assess their preparations for continuing to source labour should a trade deal with the European Union (EU) not be agreed and freedom of movement of labour within the EU ceases. The work with our supply chain to ensure that they implement adequate checks on potentially new sources of labour, thus mitigating an increase in the risk of modern slavery.

#### **5. More rigorous access control to construction sites**

To assist in combating fraud and identification theft, Countryside is implementing biometric induction verification across all of its construction sites. This is a process of identity authentication using the fingerprint as the uniquely detectable biological trait. The objective is to materially reduce the risk of fraudulent identification attempts by unauthorised and/or unqualified workers on site.

#### **Our performance indicators**

Countryside has determined that the effectiveness of the steps being taken to ensure that slavery and/or human trafficking is not taking place within our business or supply chain would be tested against:

- Number of reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified; or
- Number of reports received from within our supply chain to indicate that modern slavery practices have been identified.

During 2019/20, there were no reports from employees, the public, law enforcement agencies or our supply chain to indicate that modern slavery practices are taking place. Whilst this of itself is a positive indicator, it is not taken as a cause for complacency and each year the Company strives to further improve the measures it takes to combat the risk of modern slavery. .

#### **Areas of focus and improvement during 2020/21**

In 2020, organisational changes have been implemented to create Group leadership positions for key functions such as health & safety, buying and commercial. One of the principal aims of this change is to improve the standardisation of a broad range of operational controls across the Countryside Group, including those outlined above, which in turn will help to mitigate the risk of modern slavery.

We have also tightened our supply chain portfolio by increasing trade with national companies which exceed the turnover criteria for mandatory compliance with the Modern Slavery Act of £36m p.a in lieu of smaller regional businesses.

This statement was approved by the Board of Countryside Properties PLC and the subsidiary companies listed below and in accordance with the requirements of the Act it will be reviewed and updated annually.

**Iain McPherson**  
**Group Chief Executive**  
**2 December 2020**

#### **COUNTRYSIDE COMPANIES AND SUBSIDIARY COMPANIES ON BEHALF OF WHICH THIS SECTION 54 MODERN SLAVERY STATEMENT IS MADE:**

Countryside Properties PLC  
Countryside Properties (UK) Limited  
Millgate Developments Limited  
Countryside Properties (WPL) Limited

#### **COUNTRYSIDE JOINT VENTURE COMPANIES ON BEHALF OF WHICH THIS SECTION 54 MODERN SLAVERY STATEMENT IS MADE:**

Countryside Zest (Beaulieu Park) LLP  
Acton Gardens LLP