

## **Modern Slavery Act 2015 - Compliance Statement 2023**

This Compliance Statement sets out Regenda's commitment to preventing, identifying and reporting modern slavery and human trafficking in its business activities.

The Statement relates to the financial year 2022/2023 and covers all organisations within the Group (as detailed below).

The Group strives to promote ethical behaviours across the whole business including recruitment, operational procedures and behaviours within our own workforce and in the relationships with our supply chain.

**Our Organisational Structure:** Regenda Limited, trading as Regenda Homes, is a charitable registered society under the Co-operative and Community Benefit Society Act 2014 and is a provider of social housing and related services in the social housing sector registered with the Regulator of Social Housing. It is the parent organisation for the Regenda Group that includes:

- Redwing Living Limited
- M&Y Maintenance & Construction Limited
- Petrus Community
- The Learning Foundry Limited
- Centre 56 Limited
- Regenda Developments Limited
- National Communities Resources Centre
- Ecogee Limited

The Group has over 780 employees and operates in England and is an accredited Living Wage employer.

It should be noted that whilst this Modern Slavery Act Statement applies to the whole Group, only Regenda Limited's turnover is in excess of £36m that is a requirement for compliance under the Act.

**Our Business Activities:** As well as providing social housing, the organisations within the Group also provide homes for part ownership, outright sale and associated housing management services. In addition services also include associated maintenance and construction services both inside and outside the Group; supported housing services; property letting; training & apprenticeships; career-based learning and childcare services.

All organisations within the Regenda Group work hard to make sure they are ethical businesses and we want to make sure we only work with organisations that have the same commitment.

The Group has a Social Value Investment Policy that provides a framework for the Group to invest surplus cash reserves to generate social return. The social value work that we undertake in communities provides benefits that can aid the cohesiveness of both the community and the local economy. Programmes provided by Regenda Homes and subsidiaries such as The Learning Foundry

support this by creating training and employment opportunities thereby ensuring that people are not left behind and are not living in poverty. Healthy and sustainable neighbourhoods do not foster the conditions that modern slavery will thrive in. Modern Slavery can be seen in many instances to be a by-products of poverty and through our work we seek to eradicate poverty and lack of health and wealth.

The Group's Investment Policy enables investment in ethical equities. As part of the criteria of which companies we are prepared to invest in, consideration is given to the company's reputation and track record on proactively managing its responsibilities to employees and supply chain to reduce the risk of unethical labour practices.

**Our Supply Chains & Procurement:** We do not have any supply chain in countries that have been identified as high risk in the Global Slavery Index and we want to continue to make sure that there is no modern slavery or human trafficking in the supply chains we work with. We continue to work hard to ensure all suppliers are pre-approved and have undergone thorough checks.

Our procurement process is overseen by a Procurement Manager who ensures consistency across the Group. The procurement process emphasises the Group's aim to not only ensure value for money but also foster collaborative working relationships with suppliers and contractors that ensure social value as well as commercial value.

M&Y Maintenance & Construction has a Dynamic Purchasing System (DPS) that is a procurement tool that enables the Group to establish a pre-approved list of subcontractors and suppliers that ensures certain criteria is met before being appointed to that list.

**Risk Management and Due Diligence:** The Group has a number of policies that we believe assist in the detection and prevention of Modern Slavery and Human Trafficking that include:

- Safeguarding Adults at Risk Policy
- Safeguarding Children at Risk Policy
- Speak Up Policy
- Anti-Fraud Policy
- Code of Conduct
- Financial Regulations (including procurement and supply chain management)
- Recruitment and Selection Policy

**Staff Awareness & Training:** As an employer the Regenda Group carries out the necessary checks for all new starters that includes eligibility to work in the UK as well as DBS (Disclosure and Barring Service) for all staff working with vulnerable customers.

The Group has a Speak Up Policy that has recently been refreshed and all staff undergo annual awareness sessions so that they understand the Policy and are clear on the process for raising concerns. New starters are also made aware of this Policy and how to report.

The Safeguarding Policy is separated so that we have a dedicated policy for Adults and Children. Training sessions continue to be held with all staff on these policies and how concerns should be raised to the Safeguarding Team. This training is also being extended to volunteers and agency staff.

The Group's SHE Health & Safety Software manages a range of health & safety activities and has also improved the reporting and management of safeguarding cases.

As sub-contractors are used on the Group's construction projects, specific training has been carried out with M&Y Maintenance and Construction site staff to raise their awareness around identifying individuals who may be victims of modern slavery.

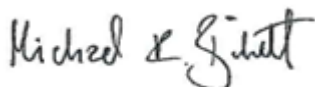
**Ongoing Action:** We will continue to review our response to the prevention of modern slavery and human trafficking over the next 12 months by:

- Continuing to raise awareness with staff with a particular emphasis on those staff working with vulnerable groups or in areas that have been identified as having a high predication for modern slavery or human trafficking led by the Safeguarding Team
- Continuing to strengthen the Group's procurement activities in order to maximise social value and foster collaborative partnership arrangements
- Strengthening our process for supplier risk assessments that will include collecting information on their cyber security and modern slavery compliance
- Implementing the integration plan in place with Ecogee Limited who joined the Group in May 2023 in order to ensure compliance with the Modern Slavery Act for the 2024 statement.

Regenda will take steps to report any suspected or actual acts of modern slavery or human trafficking to the relevant authorities.

This statement is made under section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2023 during which time the turnover of the Group exceeded £36 million.

This statement has been approved by Regenda's Executive Team and Group Board. It applies to all organisations within the Group and will be reviewed every year.



Dr Michael Birkett  
Group Chief Executive