

Modern Slavery Policy

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• Introduction

Newett Homes is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are dedicated to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to prevent slavery and human trafficking.

• Definitions

For the purpose of this policy:

- Modern Slavery includes all forms of slavery, servitude, and forced or compulsory labour, human trafficking, and the exploitation of vulnerable individuals.
- Supply Chains encompass all suppliers, service providers, and business partners, regardless of their location or role in the provision of goods or services to Newett Homes.

• Our Responsibility

We acknowledge our responsibility to the Modern Slavery Act 2025 and will ensure transparency within our organisation and with our suppliers. We are committed to preventing slavery and human trafficking in our corporate activities and to ensuring that our supply chains are free from such practices.

• Risk Assessment

We will conduct a thorough risk assessment of our supply chains to identify and assess potential risks of modern slavery and human trafficking. This assessment will include, but is not limited to:

- Geographical areas with high-risk profiles.
- Supplier relationships, contracts, and agreements.
- Product and service categories that are at risk.
- Employment practices, including recruitment and labour conditions.

• Supplier Due Diligence

Newett Homes is committed to working with suppliers who share our values and ethics. We will:

- Assess potential suppliers before entering into a business relationship.
- Incorporate anti-slavery and human trafficking clauses into contracts with suppliers and service providers.
- Work with suppliers to improve their practices if concerns are identified.
- Regularly review and monitor supplier compliance with our Modern Slavery Policy.

• Employee Awareness

All employees, contractors, and agents of Newett Homes will receive training to ensure they understand the signs of modern slavery and human trafficking and their role in preventing it within the organisation and its supply chains.

- **Reporting and Whistleblowing**

We encourage all employees, contractors, and stakeholders to report and concerns related to modern slavery or human trafficking within our organisation or supply chains. We will ensure that there is a process for confidential and anonymous reporting, and all concerns will be thoroughly investigated.

- **Compliance and Accountability**

We will regularly review and update this policy to ensure its effectiveness in preventing modern slavery and human trafficking. The board of directors and senior management of Newett Homes are responsible for implementing this policy and ensuring that it is communicated to all employees and stakeholders.

- **Training**

To ensure that employees understand this policy and are able to act in accordance with it, we will provide training as necessary.

- **Conclusion**

Newett Homes is committed to maintaining a culture that is hostile to modern slavery and human trafficking. We will regularly review our practices and procedures to ensure that we are effectively preventing these issues within our organisation and supply chains.

This policy will be reviewed annually and updated as necessary.



Will Newett

Managing Director

Newett Homes Ltd

25th October 2023

