

# Modern Slavery Statement for Financial Year 2022/23



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### **Latest revision September 2022**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Anwyl Group Ltd has taken and is continuing to take to ensure that Modern Slavery or Human trafficking is not taking place within our business or supply chain.

A review of our Modern Slavery and Human Trafficking statement was undertaken during this year.

## **Our Business**

Anwyl Group Ltd remains a family-owned business and has been establish for over 90 years. Anwyl Group Ltd. operates in 3 divisions: Anwyl Homes, Anwyl Partnerships and Anwyl Land.

Anwyl Homes deliver new build homes across 2 divisions, Cheshire & North Wales, and Lancashire. Anwyl Partnerships delivers contracts for both private and public sector clients. Anwyl Land provides services to procure and develop land across the UK. We maintain an organisation governance structure comprising of Group Board who remain accountable for this statement, with delegated authority to the Senior Leadership Team who approve processes and procedures outlined in this statement are performed and assured.

We employ approximately 250 colleagues who perform a range of office based and site-based activities. We pay a minimum of the National Living Wage for all eligible colleagues and comply with all applicable employment law obligations.

# Our Supply Chains

We procure a wide range of goods and services through a diverse supply chain which includes: -

- Main Contractors
- Sub-contractors who provide materials, labour, and plant
- Manufacturers and Suppliers who deliver direct to site or to the subcontractor
- Utility companies
- Professional and specialist consultants

We have a stable supply chain allowing us to benefit from a significant number of long-term trading relationships. Our Group commercial department manages material ordered for our regions and applies rigorous due diligence within the supply chain.



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# Due Diligence

Anwyl Group Ltd complete risk assessments throughout the Supply Chain, we review our processes annually and consider there remains an overall low risk of Modern Slavery and Human Trafficking incidents happening within our business.

To ensure we complete through diligence Anwyl Group Ltd operate a process whereby all suppliers and sub-contractors must complete a pre-qualification questionnaire prior to being considered for working in partnership with Anwyl. This completed questionnaire, collects information regarding contractor and sub-contractor competency and practices for employment and in turn their own supply chain of due diligence for Modern Slavery and Human Trafficking prevention. This document is reviewed by commercial and HSE departments to ensure the information provided meets the standards and requirements of Anwyl Group Ltd. and is stored accordingly.

# Our Policies and Procedures

Our internal policies and procedures ensure we conduct our business in an ethical and transparent manner, these include: -

### Recruitment

We operate a robust recruitment process, including conducting right to work in the UK checks for all colleagues to safeguard against Modern Slavery and Human Trafficking. We are digitising our recruitment process to further enhances the process, data processing and storage of information.

### Supplier and Contractor Control Procedure

This details the process and due diligence when authorising and monitoring the supply chain and associated practices and is reviewed regularly

### Grievance and Whistleblowing

We have processes in place so all colleagues know that they can raise concerns about how colleagues are being treated, or practices in our business or supply chain without fear of reprisal.

Our Colleague handbook explains the way we behave as an organisation and how we expect our colleagues and suppliers to act.

### Colleague Training

We provide training for all our colleagues annually to ensure they understand the importance of the topic and what to do if they suspect signs of Modern Slavery or Human Trafficking.



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# Our Suppliers

Anwyl Group Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers. The due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern Slavery and on-site audits which include a review of working conditions. Ensuring our suppliers and contractors conform to the Modern Slavery Act 2015 forms part of our contract with suppliers and they are required to confirm that no part of their business contradicts this statement.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that: -

- They have taken steps to ensure Modern Slavery does not occur in their business
- They hold their own suppliers to account over Modern Slavery
- They make sure they complete all the right to work documentation for new starters.
- They make sure employees know their statutory rights including sick pay / holiday pay
- We may terminate the contract at any time should any instances of Modern Slavery come to light

# Further Steps

We will know the effectiveness of the steps we are taking to ensure the Modern Slavery and /or Human Trafficking is not taking place within our business or our supply chain, colleagues understand the importance of this subject, colleagues know how to report any suspected incident and the way we deal with any suspected incidents. If reports are received from colleagues, the public or law enforcement agencies, we will ensure that they are fully investigated and processed accordingly.

In the last 12 months the group can report the following: -

- We have carried out a risk assessment of our direct and indirect supply chain to identify areas of vulnerability
- Training has been provided to colleagues to provide them with the necessary tools to identify Modern Slavery or Human Trafficking within our business and our supply chain
- We have had non suspected incidents of Modern Slavery or human Trafficking reported directly to us or vis our whistleblowing procedures
- We have refreshed all terms and conditions of purchase to reflect current legislation

### Approval for this statement

This statement was approved by group board and is signed on its behalf by

Tom Anwyl Group Director September 2022

Note this statement covers the practice of Anwyl Group (company number 04375093)

