

## **Peabody Group - Modern Slavery and Human Trafficking Statement 2024**

As a responsible employer and business, and as an organisation dedicated to improving the lives of our residents and the communities we serve, Peabody is committed to doing everything we can to prevent slavery and human trafficking. This statement sets out how we deliver that commitment, understanding and mitigating the risks of slavery or human trafficking taking place within our business or supply chain, and demonstrating compliance with the Modern Slavery Act 2015 (the Act). It is intended to provide our stakeholders with information to make an informed choice about their dealings with us.

### Our business

Peabody was established in 1862 by the American banker and philanthropist, George Peabody. We are one of the oldest and largest housing associations in London and the South East. In April 2023, Peabody merged with Catalyst Housing Limited, another housing association with similar values and goals, including a commitment to do everything possible to eliminate modern slavery and human trafficking. Following that merger, the Peabody Group is responsible for 107,000 homes and 220,000 residents across London and the South East. We have 17,500 care and support residents.

As well as bricks and mortar, Peabody works with multiple agencies and provides community programmes and care and support services for the benefit of our residents, residents and for people living in the surrounding neighbourhoods, including employment and training support; health and wellbeing projects; family support programmes; welfare benefits advice; and activities for younger and older people. We also seek to influence public policy through our evidence-based research work and publications, such as the Peabody Index. Regulated by the Regulator of Social Housing, all of Peabody's work aims to tackle poverty at its roots, and support the most vulnerable people in our communities, supporting people to transform their lives and communities for the better and helping people flourish.

### Peabody Group

This statement has been prepared to cover the activities of Peabody Trust and its subsidiaries, Peabody Developments Limited, Peabody (Services) Limited, Peabody Construction Limited and Catalyst By Design Limited; as well as other subsidiaries of Peabody Trust, as set out on Peabody's website. Town and Country Housing, Peabody's subsidiary which provides homes and services in Kent, Sussex and Surrey, has its own Modern Slavery Act statement, which is aligned to this statement.

### Robust strategies, policies, and procedures

The Group has strategies, policies and procedures in place which help detect and prevent slavery and human trafficking. These cover our workforce, our supply chain, and our residents as well as the wider communities we work with across London. They include:

- paying the Real Living Wage as a minimum to all Peabody Group employees;
- encouraging colleagues not to work in excess of the number of hours permitted by law;
- requirements for all new employees to provide verified documents (such as a passport) before their start date to verify their legal right to work in the UK;

- strategies and policies on equality and diversity, vulnerability, safeguarding, domestic abuse and violence against women and girls, including specialist training and support for front-line employees;
- the requirement that all employees adhere to Peabody's updated Code of Conduct and related policies, which include provisions against bribery, and requirements in relation to workplace behaviour and equality and diversity;
- a Whistleblowing Policy which protects employees and contractors from negative repercussions if they make a report in good faith about an apparent breach of legislation or Peabody's Code of Conduct, and requires that all such reports will be properly investigated and acted upon, as necessary. Our policy makes it easier for anyone with concerns to provide us with information, with confidence that we will take it seriously and treat it confidentially;
- checking for signs of modern slavery and human trafficking during home or site or scheme visits, as well as any other welfare concerns which the tenants or members of their households or our contractors or members of the public, may have.
- where we have concerns, we undertake a review to investigate the matter (using specialist and/or independent advice where required) and report the matter to the relevant authorities in line with our policies and procedures and wider safeguarding approach; and
- thoroughly investigating reports of subletting and taking robust action against it. Peabody will support prosecutions where it is appropriate and issue money claims to prevent profiteering from subletting social housing.

### An engaged workforce

Peabody regularly reviews its policies and practices to make sure they are compliant with legislation and in line with organisational needs and best practice. The Peabody Code of Conduct and related policies apply to all board and committee members, employees, involved residents, contractors, consultants, and agency staff. They are designed to assist employees and others working with Peabody to understand their responsibilities and obligations and provide guidance on expected behavior in the workplace. As a housing association and organisation active in community work across London, Essex, Kent and the Home Counties, Peabody is well placed to identify signs of slavery and human trafficking, and as such we place value on the training our front-line employees receive to help them spot issues when going into homes and meeting residents.

Peabody has zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees or Board Members, or their families or close associates.

### Our supply chain

In relation to new suppliers, the first step is to set clear expectations for our suppliers. For any tenders for contracts above the Find a Tender Service (FTS) threshold, compliance with the Act has been included within the selection process. Any failure to meet this will lead to disqualification of the applicant. For contracts or agreements below the FTS thresholds,

clauses are included within the Group's standard terms and conditions seeking assurance from suppliers that they comply. In addition, requests for quotations include a compliance check with the Act. Peabody has a Contract Management Framework, which supports our compliance by requiring all colleagues to monitor compliance with the requirements of the Act on an ongoing basis as well as at the outset of the relationship. In addition, we have added all our active suppliers to an online platform which tracks all legal events and judgements placed against firms. Our new approach to Supply Chain Compliance supports compliance by increasing the visibility of suppliers' stance / policies. We monitor updates to these companies to see any changes in risk levels which may indicate non-compliance with the Act. We have also added a greater focus on Social Value within the procurement process.

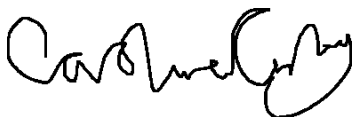
We do not knowingly support or deal with any business involved in slavery or human trafficking.

### Development Activities

In relation to our development activities, Peabody has a strong view that combatting modern slavery and human trafficking should be a priority for all in the construction industry. Actions to date by our development team have included:

- conducting a review along with our Procurement team to ensure that our compliance requirements within our contractors' framework are sufficiently robust;
- requesting and reviewing Modern Slavery statements, policies, and updates from our existing contractors;
- updating our Employer's Requirements to include a specific requirement for contractors to provide posters on site signposting modern slavery helplines;
- rolling out an appropriate e-learning module which all colleagues in our Development team are required to take annually;
- reviewing further measures on a continuous basis, such as a protocol for monitoring via monthly site meetings and site inspections; and
- conducting a continuous review of our Development Control Manual to consider, amongst other things, further detail on understanding and how to act if any particular instances are detected on site.

**Signed:**



**Caroline Corby**

**Chair of the Board**

**Approved by the Board of Peabody Trust on 24 July 2024**