

1: Introduction

Heylo Housing Group is committed to preventing acts of modern slavery and human trafficking from occurring in its business activities and, as far as practicable, within its supply chains. This statement sets out the steps that have been taken by the business to manage the risk of modern slavery and human trafficking during the financial year 1 October 2021 to 30 September 2022, pursuant to section 54 (1) of the Modern Slavery Act 2015 (the Act).

2: Structure of the organisation and our supply chains

Heylo Housing Group (the Group) consists of Heylo Housing Group Limited, Heylo Housing Registered Provider Limited, HH No.1 Limited, HH No.2 Limited, HH No.3 Limited, Heylo Housing Secured Bond Plc, HH No.5 Limited and HH No.6 Limited. Heylo Housing Registered Provider Limited is a registered provider of social housing and all companies in the Group are based and operate in the UK.

Across the Group, we provide more than 7,000 shared ownership homes in England and Wales. Our business model is to drive the delivery of affordable housing by acquiring new build and existing homes for shared ownership, with sister company Resimangement Limited providing asset management services to the Group. We plan to expand into delivering rented homes in addition to our shared ownership housing provision in 2023.

To find out more about the nature of our business, please go to www.heylohousing.com

In order to deliver our shared ownership homes, we work with a range of suppliers, working primarily with UK-based housebuilders that construct our new build homes. With expanding repair and maintenance obligations on shared ownership landlords, we also partner with companies providing property maintenance services across the UK to manage our contractor supply chain.

3: Policies

As part of our commitment to combating modern slavery, we have implemented our Whistleblowing Policy and Grievance Policy to facilitate members of staff to raise any concerns, including in relation to suspected instances of modern slavery, and have developed our Anti-Slavery Policy which will be implemented by the end of 2022. Our Whistleblowing Policy enables employees to report any concerns without fear of reprisal or retaliation. Heylo Housing Group encourages all its employees to raise any issues relating to the activities of the business and its supply chains to senior management and is committed to responding immediately to any reports of suspected instances of modern slavery and human trafficking.

4: Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we review the statements of all the housebuilders that we work with that are required to publish statements in accordance with the Act. We also ensure that the companies that provide us with property maintenance services have procedures and

mechanisms in place to ensure contractor compliance with the Act, including reminding contractors of their obligation to comply.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

We are currently developing our supplier due diligence questionnaire which we will circulate to suppliers on a risk basis in the coming year to help us identify and monitor the risk of slavery and human trafficking in our supply chain.

5: Risk and compliance

Heylo Housing Group regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by conducting periodic due diligence on its third party partners, including reviewing the Modern Slavery Statements of our suppliers where they are required to publish one.

We do not consider that we operate in high risk sectors or locations because of the nature of the firm's business model and relationships with its third party partners and vendors. We consider the construction activities of the housebuilders that we partner with to deliver our new build homes to be our greatest risk of slavery and human trafficking. This is why we review the statements of relevant housebuilders and will require the housebuilders that we contract with to complete our supplier due diligence questionnaire in the coming financial year.

Where we have identified a potential risk through conducting specific due diligence, or through the normal course of operations with a partner, the firm will undertake an investigation process in order to ascertain the potential impact and likelihood of the risk crystallising.

6: Effectiveness and KPIs

The Group does not currently have any key performance indicators in relation to the risk of slavery or human trafficking. As we develop our supplier due diligence process over the next financial year, we will look to implement new KPI's to report on this process and monitor its effectiveness.

7: Training

We do not provide training to staff on the risks of modern slavery and human trafficking but are planning on launching training for all staff on this topic in the next financial year. We are reviewing the training options available and will ensure that all employees complete the training to enable them to better identify and understand the risk of modern slavery and human tracking within the next year. This will then become an obligatory part of staff training for new joiners.

8: Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Implement our Anti-Slavery Policy by the end of 2022
- Require all staff to complete training on how to recognise the risks of modern slavery and human trafficking in our business and supply chains
- Implement our supply chain due diligence questionnaire, circulating it to suppliers on a risk basis for completion

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Heylo Housing Group's slavery and human trafficking statement for the financial year commencing 1 October 2021 and ending 30 September 2022.

Signature:

Andrew Geazy

Heylo Housing

Date: 11/11/2022