

Modern Slavery and Human Trafficking Statement

Raven Housing Trust Group is committed to ensuring our practices combat slavery and human trafficking. This statement for the financial year ended 31 March 2021 sets out the steps that Raven Housing Trust (RHT) and its wholly owned subsidiary companies, has taken in the last year to ensure modern slavery is not taking place in our business or supply chains and is made pursuant to Section 54 of the Modern Slavery Act 2015.

This statement covers RHT and its wholly owned subsidiaries as set out below:

- Raven Housing Trust, a Community Benefit Society and a Registered Provider of housing regulated by the Regulator of Social Housing.
- Raven Development Homes Limited, a wholly owned subsidiary of RHT that is concerned with the construction of new homes for outright sale.
- Raven Repairs Limited, a wholly owned subsidiary of RHT that undertakes commercial repairs and maintenance services which would otherwise be ultra vires for RHT.
- Raven Devco Limited, a wholly owned subsidiary of RHT that provides development services to RHT.

The Group operates within the social, affordable, private sale and market rent housing sectors and provides some commercial services. Raven Housing Trust develops, owns and manages properties within Surrey and Sussex and, as a Registered Social Landlord, is a contracting authority and subject to the Public Contract Regulations 2015.

The information provided below describes the systems and controls which have been in place in the last year to minimise modern slavery and human trafficking from occurring in our operations, supply chains and communities.

Due Diligence Measures

Raven's tendering processes followed best practice and, when seeking new suppliers, bidders were required to provide details of their own statement, or confirmation of their adherence to ours if their turnover was below the threshold. Raven provided its factsheet for below threshold suppliers, to enable them to proactively take steps to avoid modern slavery practices. This factsheet explained what modern slavery is, their obligations as suppliers, and operating categories considered to be of particularly high risk.

We only engaged with suppliers and contractors who confirmed their compliance with the Modern Slavery Act 2015. All new contracts included a clause requiring our suppliers, and their subcontractors, to comply with the Act. If a supplier breached this obligation Raven would have the right to terminate. In addition, we required any new works contractor to confirm their commitment to our Contractors Code of Conduct.

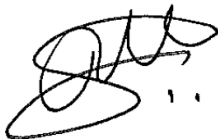
As part of Raven's preparation for Brexit, additional checks were made with regards to third party supplier and employees' Right to Work in the UK and no issues were brought to the attention of the Procurement team.

Raven used only specified, reputable employment agencies to source labour and always verified the practices of new agencies before accepting workers from that agency. These agencies were managed centrally by the People Team, to ensure that the appropriate controls were maintained.

Training and Awareness

Raven ensured that employees were provided with mandatory e-learning training in order to mitigate the risk of slavery or human trafficking in the workplace. It was also included as part of the staff induction process to raise awareness of the specific safeguarding risks that may occur in social housing.

This document constitutes our current Modern Slavery & Human Trafficking Statement and has been approved by the Board, who will review and update the statement annually.



Jonathan Higgs, Chief Executive
March 2021