

Modern Slavery and Human Trafficking Statement

Raven Housing Trust is committed to ensuring our practices combat slavery and human trafficking. This statement for the financial year ended 31 March 2026 sets out the steps that Raven Housing Trust (RHT) and its wholly owned subsidiary companies, have 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 (the “Group”) as set out below:

- Raven Development Homes Limited
- Raven Repairs Limited
- Raven Devco Limited

The Group operates within the social, affordable, private sale and market rent housing sectors and provides some commercial services through its subsidiaries.

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 Procurement Act 2023 which replaced the Public Contract Regulations 2015 and introduced a new procurement regime.

Raven Housing Trust has aligned its practices with the following legislative updates:

- Revised Transparency in Supply Chains guidance under the Modern Slavery Act 2015 (March 2025).
- Procurement Act 2023 (effective February 2025), replacing the Public Contracts Regulations 2015.

The information provided below describes the systems and controls which have been put 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 relevant 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 (the “Act”). 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 the contract.

In addition, we required any new works contractors to confirm their commitment to our Contractors' Code of Conduct and carried out checks of third-party suppliers. 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. We also carried out checks of all new employees' Right to Work in the UK.

Risk Assessment and Monitoring

We have enhanced our risk assessment tools and stakeholder engagement to identify and mitigate modern slavery risks. Key performance indicators (KPIs) are used to monitor progress and evaluate effectiveness.

Training and Awareness

Every new member of staff undertakes mandatory training on the Safeguarding Policy and there is a Modern Slavery Course on the iLearn portal. The Safeguarding training includes awareness of the specific safeguarding risks that may occur in social housing. Refresher training will take place annually for all staff.

Safeguarding

Raven recognises that modern slavery and human trafficking are safeguarding issues which may affect residents, customers and members of the wider community. Safeguarding concerns, including any indicators of potential exploitation, are reported and monitored through Raven's safeguarding framework. Management information on safeguarding activity, themes, risks and learning was reported to the People & Customer Committee twice in the year ended 31 March 2026, providing oversight of safeguarding arrangements and assurance that appropriate action is taken where concerns are identified.

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

2nd September 2026