



## HOPKINS HOMES

# Modern Slavery Policy

At Hopkins Homes, we are committed to developing and adopting a zero-tolerance approach to Modern Slavery and hidden labour exploitation. We will not knowingly trade or partner with any business or organisation which is involved in this shocking practice however remotely or indirectly.

Modern slavery is a serious crime in which victims are exploited for someone else's gain. It can take many forms, including trafficking of people, forced labour and servitude.

Some of the signs of modern slavery to look out for, include:

- Workers are distrustful of authority.
- Workers look uneasy, unkempt or malnourished.
- Signs of psychological trauma.
- Untreated injuries.
- Evidence of control outside of work.

### **Our Business and Supply Chain**

The risks relating to modern slavery and human trafficking can apply anywhere in our operations. As a responsible developer we value our supply chain as key business partners. We expect our suppliers and contractors to be able to demonstrate that they have steps in place to prevent exploitation of their workforce and supply chain.

If issues are identified (including through our audit process) which are not resolved to our satisfaction, we will review the relationship with the relevant organisation and take remedial action, as appropriate.

### **Our Approach**

Our approach to assessing and managing the risk of modern slavery and human trafficking is as follows:

1. We have a company-wide policy confirming our 'zero tolerance' approach to modern slavery and human trafficking.
2. We require our sub-contractors and suppliers to acknowledge their responsibility for complying with all legislation relating to modern slavery and human trafficking, as updated or replaced from time to time.
3. We undertake periodic risk assessments to identify the key modern slavery and human trafficking risks in our business and supply chain.
4. Our contractual terms include obligations on our sub-contractors and suppliers (and in turn their agents, employees and sub-contractors) to comply with all legislation relating to modern slavery and human trafficking, as updated or replaced from time to time.



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5. Our policies require our sub-contractors to complete an assessment to confirm that they comply with Hopkins Homes' approach to modern slavery and human trafficking.
6. We undertake checks on new recruits to ensure that they are eligible to work in the relevant country of employment.
7. We continue to deliver training to employees about modern slavery and human trafficking and how to take steps to prevent it.
8. We monitor, through Hopkins Homes' internal, standalone compliance policies and procedures, the implementation of our policies, training and procedures which relate to modern slavery and human trafficking. This includes mandatory training for new joiners, of which rates of completion are monitored monthly, and failure to complete within a deadline is a disciplinary matter.

### **Next steps**

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking by:

1. Regularly reviewing our Anti-Slavery and Human Trafficking Policy (and related policies) and the related procurement standards.
2. Continuing to assess the risks of modern slavery and human trafficking in our business and our supply chain.
3. Regularly assessing our pre-qualification standards for the appointment of new suppliers and subcontractors. In particular, asking suppliers to complete an assessment to confirm that they comply with all legislation relating to modern slavery and human trafficking, as updated or replaced from time to time.
4. Through Hopkins Homes' risk register, assess key modern slavery and human trafficking risks in the business and supply chain, and taking necessary steps to mitigate the risk.
5. Reserving the right to audit certain key supply-chain partners to assess their controls.
6. Reviewing and updating our programme to identify and manage any modern slavery and human trafficking risks associated with high-risk goods and services.
7. Keeping under review the due diligence procedures for our supply-chain, which apply both prior to appointment and thereafter.
8. Auditing key providers of temporary labour.
9. Providing up to date training to our employees on identifying potential modern slavery or human trafficking within our operations and supply chain.
10. Monitoring the effectiveness of steps taken by Hopkins Homes to ensure modern slavery and human trafficking is not taking place, by setting performance indicators as it deems appropriate (e.g., percentage of suppliers vetted for adequate practices; number of suppliers screened; and inspections of sub-contractors).

Duncan Jackson  
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