

# SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 31 MARCH 2021

## INTRODUCTION

Story Homes Limited ("**Story Homes**") published its first modern slavery statement in December 2016. This is the sixth statement made on behalf of Story Homes pursuant to section 54(1) of the Modern Slavery Act 2015 (the "**Act**") and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2021. This statement sets out the steps that Story Homes continues to take to prevent modern slavery and human trafficking in its business and supply chains.

Story Homes fully supports the aims of the Act and is fully committed to ensuring that the company is compliant with the statutory requirements affecting our employees and supply chain.

Like most businesses, we have had to adjust our ways of working as a result of the Covid-19 pandemic.

## ORGANISATION'S STRUCTURE

Story Homes is an award-winning property developer with 24 schemes in Cumbria, North West and North East England and southern Scotland. The company was founded in 1987 by Fred Story as Story Construction Limited, which later de-merged to become Story Homes and Story Contracting Limited.

Story Homes' head office is based in Carlisle with regional offices in Newcastle-upon-Tyne and Chorley.

## OUR BUSINESS AND SUPPLY CHAIN

We provide homes direct to the consumer and comply with the Consumer Code for Home Builders. Consumers can purchase homes with the assistance of Help to Buy schemes (England and Scotland) and we also have an "Early Bird" scheme allowing homes to be reserved prior to their official release for sale. Our reputation is firmly built on the quality of our exceptional homes and our high standards of customer service; all of our customers benefit from our customer aftercare package.

In 2020/21, Story Homes built and sold 631 new homes across its three operating regions.

As at 31 March 2021, the company directly employed c.360 staff working exclusively in the UK and had an annual turnover of approximately £174m.

We procure a wide range of goods and services through our supply chain which includes building contractors, subcontractors who provide labour, materials and plant, manufacturers and suppliers, utility providers and a range of other associated trades and professional services connected with housebuilding (collectively referred to as "suppliers" in this statement). We aim to use suppliers that are headquartered locally in relation to the areas in which we operate wherever possible and they range from SMEs to large corporations.

We usually have a stable supply chain allowing us to benefit from a significant number of long-standing trading relationships with like-minded subcontractors, suppliers and consultants who share our values and ethics. As a result of the Covid-19 pandemic, we have had to use alternative suppliers in relation to some elements of our business; in relation to these suppliers, we carried out proportionate due diligence to mitigate the risks to our business.



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## **OUR APPROACH**

Our Board of Directors takes a zero-tolerance approach to human trafficking and modern slavery in our business and supply chains. The Board of Directors has overall responsibility for ensuring that Story Homes complies with its legal and ethical obligations and receives updates on the nature and requirements of the Act, and the impact on our business.

We are committed to ensuring that there is no modern slavery or human trafficking in our business or any part of our supply chain and have in place an Anti-Slavery and Human Trafficking Policy that all our employees must comply with. Should any incident come to our attention, a zero-tolerance approach will be adopted. Our Business Code of Conduct includes a whistleblowing policy, which encourages employees to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain at the earliest possible stage and without fear of retaliation. We will review all instances of non-compliance with modern slavery and human trafficking laws or our policies, on a case-by-case basis, and take appropriate action against any individuals or organisations breaching such laws or our policies.

Our recruitment policy confirms that we require all recruitment agencies engaged with Story Homes to agree to and comply with our Anti-Slavery and Human Trafficking Policy.

We undertake comprehensive pre-employment checks of all prospective employees. We pay a minimum of the National Living Wage to all of our eligible employees and comply with all applicable employment law obligations.

We maintain an internal governance structure at both operational and leadership levels. Whilst the Legal Team, together with our senior leaders remain responsible for engagement with our modern slavery processes and procedures, we are focusing on communicating a “whole business” approach throughout our business. This approach will ensure that everyone has the required knowledge to spot the signs and be confident in reporting any actual or suspected incidents of non-compliance with laws on modern slavery and human trafficking or our policies.

We have a training package, which consists of e-learning and site managers are provided with face-to-face training sessions. We have site induction packs which we require staff to self-certify that they have read and understood the information within.

All of our policies and procedures remain under review and adaptable to any changes in risks faced by Story Homes. We have set up a Compliance Committee to undertake a full review and re-refresh of our policies and procedures (including our standard supplier terms and conditions and related pre-qualification tender process) which we aim to complete by the financial year ending 2021/22. This committee comprises representatives from our Legal, HR, Procurement, Commercial and Production departments. This committee will remain as a standing committee to ensure compliance with best practice in our sector and to measure the effectiveness of our policies and procedures.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

We have a thorough due diligence process for managing relationships with our suppliers and during the financial year ending 31 March 2020 supplemented this with a revised Pre-Qualification Questionnaire to ensure that the risk of modern slavery is assessed prior to the appointment of new suppliers.



**SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR  
THE FINANCIAL YEAR ENDED 31 MARCH 2021**

**EVALUATION AND PROPOSALS FOR 2021/22**

Given our usually stable supply chain, which comprises of suppliers that share our values, our business is self-assessed as low risk in respect of modern slavery and human trafficking in both our own business and in our immediate supply chain. We repeatedly assess the risk of such practices occurring in our business and our supply chains through our procurement processes. We review our process with reference to Home Office guidance, and focus on recruitment, use of agency and temporary workers, on-boarding of new employees and our contractual terms and conditions with suppliers. We are aware of the risk of modern slavery and human trafficking within our supply chain due to the sector that we operate in, as raw materials may be sourced by suppliers from high-risk countries. We undertake due diligence on these areas and pro-actively seek to ensure that our immediate suppliers understand the risks within their supply chains given that they form part of our overall supply chain.

As a result of the Covid-19 pandemic the original timescales for progressing the Code of Conduct and a review of our policies and procedures has had to be revised. Over the course of 2021/22 we will be progressing the following matters:

<b>Proposals for 2021/22</b>	<b>Comments</b>
Code of Conduct	We continue to finalise the roll-out of the Code of Conduct, which was delayed as a result of Covid-19. We expect our suppliers, contractors and business partners to uphold this code.
Quarterly meetings of Compliance Committee	Additional meetings will be held as requested and external support will be provided to facilitate the work of the committee.
Review of Pre-Qualification Questionnaire and ongoing Risk Assessment	To be overseen by the Compliance Committee.
Review of Contractual Terms and Conditions	To be overseen by the Compliance Committee and aligned with the review of Pre-Qualification Questionnaire, the introduction of an annual questionnaire to be issued to existing suppliers and ongoing Risk Assessment.
Review of policies and procedures	To be overseen by the Compliance Committee.
Training Sessions	Facilitated by the Compliance Committee and delivered by external support. Best practice training to be provided to Compliance Committee, Board and Regional Management Teams.
Review of site induction packs	Review of information provided and self-certification mechanism.
Continue to communicate across our business and supply chains to raise awareness of modern slavery and the risks faced in our sector.	Focus on a “whole business approach” to tackling modern slavery risks.

Whilst we aim to meet 100% compliance on the above proposals by the financial year ending 31 March 2022, we will review progress every quarter and report in our next statement against the above.

This Statement was approved by the Board of Story Homes Limited on 29<sup>th</sup> September 2021.

Signed:



Fred Story  
Chairman  
29 September 2021

