#### SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR

### THE FINANCIAL YEAR ENDED 31 MARCH 2025

### INTRODUCTION

Story Homes Limited ("**Story Homes**") published its first modern slavery statement in December 2016. This is the tenth 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 2025. 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 continue to implement working practices and policies to enable safe operations and to ensure that we comply with Government guidance and industry regulatory requirements.

### **ORGANISATION'S STRUCTURE**

Story Homes is an award-winning property developer with 25 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 in Carlisle with regional offices in Newcastle-upon-Tyne and Chorley.

# **OUR BUSINESS AND SUPPLY CHAIN**

Our business activities are the acquisition of land for development and obtaining planning permission to construct quality homes for our customers. We provide homes direct to the consumer, operate and comply with the 5<sup>th</sup> Edition 2023 Consumer Code for Home Builders. Our reputation is firmly built on the quality of our exceptional homes and our high standards of customer service; all our customers benefit from our customer aftercare package.

In 2024/25, Story Homes built and sold 802 new homes across its three operating regions.

As of 31 March 2025, the company directly employed c.343 staff working exclusively in the UK and had an annual turnover of approximately £251.8m.

We procure a wide range of goods and services through our supply chain which includes contractors, subcontractors who provide labour, materials and plant, manufacturers and suppliers, utility and services 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 labour and materials shortages 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.

### **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. Disciplinary, Wellbeing (Sickness Absence), Equality and Diversity and Bullying and Harassment Policies are in place to help and address any relevant matters. 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 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 Group Solicitor, 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 noncompliance 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 a Compliance Committee that undertakes regular reviews and re-fresh of our policies and procedures to ensure they continue to be effective and appropriate. This committee comprises representatives from Legal, HR, Procurement, and Commercial departments. This committee is 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 supplemented with a Pre-Qualification Questionnaire to ensure that the risk of modern slavery is assessed prior to the appointment of new suppliers. In view of the challenges faced with materials and labour shortages we have during financial year 2024/25 again reviewed the existing Pre-Qualification Questionnaire and are satisfied that its contents remained appropriate at that time. We will continue to review it and update it as and when it is considered appropriate to do so.

## **EVALUATION AND PROPOSALS FOR 2025/26**

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.

Story Homes regularly reviews it contractual terms and conditions ensure compliance and to keep them in line with the requirements of the 5<sup>th</sup> Edition 2023 of the Consumer Code for Home Builders, the Business Code of Conduct and the site induction packs, and the self-certification mechanism has been reviewed, updated, and rolled out with "toolbox talks".

Over the course of 2025/26 we will be progressing the following matters:

Proposals for 2025/26	Comments
Reinstating the Compliance	Regular meetings to be held as required.
Committee	
Continue to audit	To be overseen by the Compliance Committee. A review of
contractual Terms and	Pre-Qualification (Stages 1 & 2) Questionnaires, regular global
Conditions	compliance check/audit of existing suppliers and ongoing Risk
	Assessment. Extend remit with CHAS to include compliance
	check as part of SSIP approvals.
Continue to audit business	To be overseen by the Compliance Committee and undertaken
policies and procedures	on a regular basis to gauge their effectiveness and ensure that
	Story Homes is compliant with its legal obligations and is
	adopting best practices.
Continue training sessions	e-learning refresher training implemented for all staff to be
and review existing toolbox	regularly reviewed and updated as required. Toolbox talks on
talks	general health and wellbeing in place, content to be regularly
	reviewed.
Continue to communicate	Focus on a "whole business approach" to tackling modern
across our business and	slavery risks.

supply chains to raise	
awareness of modern	
slavery and the risks faced in	
our sector.	
Continuing to perform	Conducted during one-to-one meetings and performance
welfare checks at each of	check in
our sites	

Whilst we aim to meet 100% compliance on the above proposals by the financial year ending 31 March 2026, we will review progress on a regular basis and report in our next statement against the above.

This Statement was approved by the Board of Story Homes Limited on 25 September 2025

Signed:

**Fred Story** 

Chairman

Date: 25 September 2025