

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR YEAR ENDED 31 MARCH 2019

Introduction

This statement sets out Golding Homes' actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains.

We recognise our responsibility to take a robust approach to combat slavery and human trafficking. Golding Homes is committed to preventing slavery and human trafficking in our corporate activities and to ensure that our supply chains are free from slavery and human trafficking.

This statement covers the whole of Golding Homes' group, but only Golding Homes as parent is required to produce the statement on behalf of the Group.

Golding Homes' organisational structure and supply chains

This statement covers the activities of Golding Homes and its subsidiary companies. Golding Homes is the parent of Golding Maintenance Services and Golding Places (dormant). All of its activity takes place within the South East of the United Kingdom. The principle activity of Golding Homes is the provision of homes for rent, shared ownership, development and sales.

Golding Homes delivers homes and services for over 20,000 people across Kent and we recognise our social responsibility to invest in our communities and improve the life opportunities of our residents. Our team of 150 staff, supported by our contractors and suppliers provide opportunity for affordable, independent and secure living as well as creating opportunities for personal development.

Golding Homes is committed to compliance with all legal and regulatory requirements and in establishing and following best practice. We are committed to treating those who work with us fairly and equally.

Risk Assessment

Golding Homes has assessed the risks of modern slavery and human trafficking as follows:

High risk activities

- Golding Homes does not believe there to be any high risk operations within the work of the organisations and its supply chain with regards to modern slavery and human trafficking.

Medium risk activities

- Supply chains linked to the house building and property maintenance as a result of the organisations' reliance upon external contractors to undertake a high percentage of our building and maintenance work.

Low risk activities

- Supply chains in the provision of agency staff (professional, administrative, support services and environmental services staff).

Responsibility

Responsibility for Golding Homes' anti-slavery initiatives is as follows:

Policies: All policies are reviewed by Senior Management Team under a delegated authority from the Board. All policies are reviewed on a rolling basis in response to longevity, audit, statutory or regulatory change and customer and partner feedback.

Risk assessments: Golding Homes will consider the position of its suppliers and may feel it necessary to seek assurances from suppliers on the action they themselves are taking to prevent slavery and human trafficking. Risk assessments will be carried out by the Senior Management Team, evaluating actions previously completed alongside any further propositions.

Investigations/due diligence: Individual Directors/Managers with assistance from Human Resources are responsible for investigating any suspected instances of modern slavery and human trafficking.

Training: Golding Homes' Human Resources team, under the leadership of the Head of Human Resources, are responsible for sourcing and making information and/or training available to all employees on modern slavery and human trafficking.

Relevant policies

Golding Homes operates the following policies that encompass our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy

Golding Homes encourages all our employees, customers and other business partners to report any concerns related to the direct activities, or the activities of its supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Golding Homes' whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

Employee Code of Conduct

Golding Homes' Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation. Golding Homes strives to maintain the highest standards of employee conduct and ethical behaviour when working or managing its supply chain.

Recruitment Policy

Golding Homes operates a comprehensive and transparent recruitment policy which is subject to the oversight of the Human Resources team and periodic internal audit.

Our effectiveness in combating slavery and human trafficking

Any suspected incidence of slavery or human trafficking must be immediately reported to the Senior Management Team in the first instance. It will then be dealt with appropriately and reported to the Board as necessary.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2019.