

# Modern Slavery Statement 2022-23

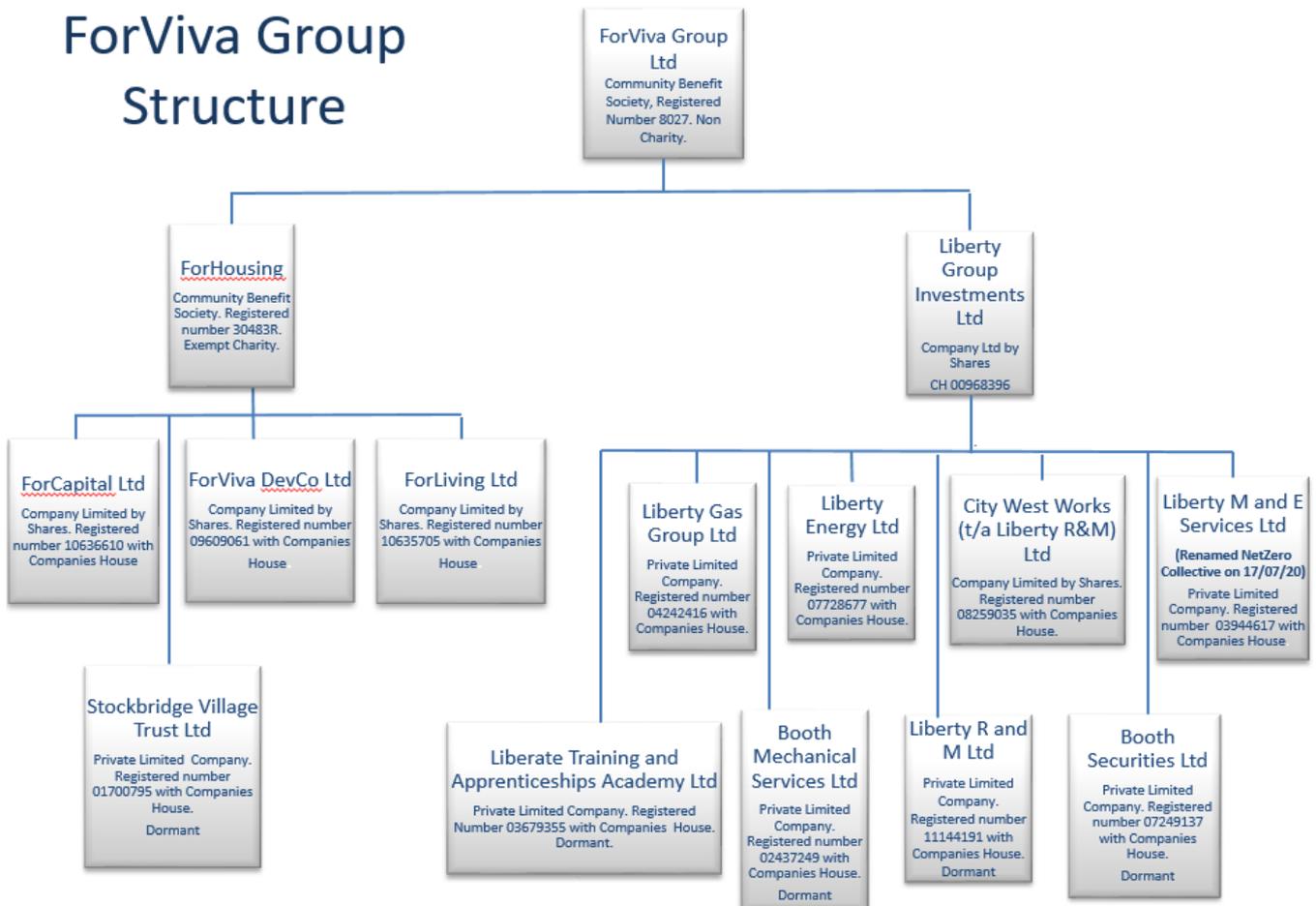
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This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for financial year ending 2023 and sets out the steps that ForViva has taken and continues to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The ForViva Group has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. We will not knowingly deal with any business involved in slavery or human trafficking.

## About ForViva

We are a social purpose business with a commercial arm which operates within the UK that positively impacts communities by reinvesting profits, building vibrant and safe communities. We know that together we can achieve more so we work with a range of like-minded partners to deliver positive change in communities and improve lives. ForViva Group structure comprises of the following companies



The Group has noted the requirements of the Modern Slavery Act 2015 (the "Act"). This statement is made on behalf of the Group parent, ForViva, and the Group as a whole. The following subsidiaries in the Group are required to make their own statement under the Act and have adopted this statement.

- ForViva Limited
- ForHousing Limited
- ForLiving
- Liberty Group Investments Ltd

## In Our Business

Potential risks are mitigated by our policies and procedures, controls built into our business operations and the knowledge, skills and behaviours of our staff. Our documents that are relevant to slavery and human trafficking are:

- ForViva Anti-Fraud, Anti-Corruption and Anti-Bribery Policy
- Group Code of Conduct Policy
- Board member Code of Conduct Policies
- ForHousing and Liberty Procurement Framework
- ForHousing Recruitment and Selection Policy and Procedure
- ForHousing Safeguarding Policy and Procedure
- Liberty Safeguarding Policy
- Liberty Recruitment Policy
- ForViva Whistleblowing Policy and Speak Up Arrangements
- Group Risk and Assurance Framework

We will continue to review and update relevant policies and procedures so that we take effective and proportionate steps to ensure there is no slavery and human trafficking in our business.

We have a robust internal audit plan in place reviewed on an annual basis which provides assurance across necessary areas of the Group.

In addition to the internal audit plan there is a robust management assurance framework across all operational areas ensuring policy and procedural compliance. The framework requires checks and balances to be completed to confirm compliance.

Procurement processes in place across the Group ensure checks in relation to modern slavery are conducted at both the new supplier stage and retrospectively for existing suppliers. This latter point takes the form of an annual questionnaire.

New employees are required to produce original documentation of their right to work in the UK on commencement of employment. We do not operate zero hours contracts and comply with the national living wage requirements. ForHousing is an accredited living wage employer.

ForHousing has good working relationships with four trade unions and meet on a quarterly bases for joint consultative meetings support their involvement in respect of employee rights.

Across the Group, we have not identified any breaches of the Act in the year under review. We will continue to be vigilant and where a compliance breach is identified, we will act promptly, involve the appropriate lead agencies and feedback lessons learnt in order to minimise the risk of an incident occurring again.

## In Our Supply Chain

As a Group, we engage with a wide variety of organisations for a broad range of goods and services which are primarily corporate, construction and property related.

Some of our suppliers' subcontract work or rely on recruitment agencies to supply permanent or temporary staff. Whilst we consider that the risk in our supply chains is low, we recognise that no supply chain can be considered entirely risk-free.

Our tendering process ensures we engage with reputable contractors and suppliers who adhere to all appropriate legislation, regulation and practices.

As noted in previous statements, modern slavery has been embedded within the tendering and contract management processes. These questions and processes will be reviewed in year for completeness.

The annual check on suppliers with an annual spend over £50k was undertaken in early 2022. Engagement in this survey is growing as suppliers become more engaged in the risk of modern slavery within their own supply chains. External reporting on modern slavery actions undertaken across the country have contributed to the wider risk awareness. The response rate has improved from the previous year which is pleasing. In the year under review, 60% of applicable suppliers provided the information required, compared to 29% the previous year.

## Training and Awareness

We recognise that certain areas of our Group operations may present opportunities to identify instances of modern slavery. This could be in relation to our tenants and customers we support, in our contractors who operate in higher risk activity areas such as home building and we recognise that our homes could be used for modern slavery.

We raise awareness of modern slavery and human trafficking through the publication of this statement on ForViva and subsidiary group websites. The Group entities have their own mandatory safeguarding training which is undertaken by their staff. These training sessions raise awareness of what slavery and human trafficking might look like and encourages staff to report concerns. Liberty's safeguarding policy is due to be reviewed in year.

We have identified that we could clarify the concern reporting process around modern slavery for contractors and staff across the Group. Currently these concerns would be raised via contract management, line management routes or whistleblowing processes. We believe we can instigate a less formal notification process and will scope out how this could be shaped, and the required training for contractors on the signs of modern slavery to strengthen our vigilance in this area. This can be tied into our safeguarding practices.

To assist with this approach, a light touch review of supplier categorisation to map out the types of supplier across the group and their risk profile will be undertaken. This will inform the concern process and help focus training for contractors. This piece of work will be scoped by December 2022 and is anticipated to conclude by July 2023.

## Approval

This statement was approved and signed by the Group Company Secretary:

Name: Catherine Hardy-Smith, Group Company Secretary

Signature:

A handwritten signature in grey ink, appearing to read 'C Hardy-Smith', written in a cursive style.

Date: 30<sup>th</sup> September 2022