

Modern Slavery Statement 2018/19

This statement sets out our actions to ensure modern slavery does not exist within our own business or across our supply chain for the year ended 31 March 2019.

Our policy

We are committed to ensuring modern slavery does not occur in our business or supply chain. We will adopt procedures and policies which address the risks of violations of anti-human trafficking and anti-modern slavery laws and we expect other organisations that we work with to adopt and enforce policies to comply with the legislation.

Our Modern Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity across our own activities and to provide assurance we have effective systems and controls to ensure modern slavery is not taking place anywhere in our supply chains.

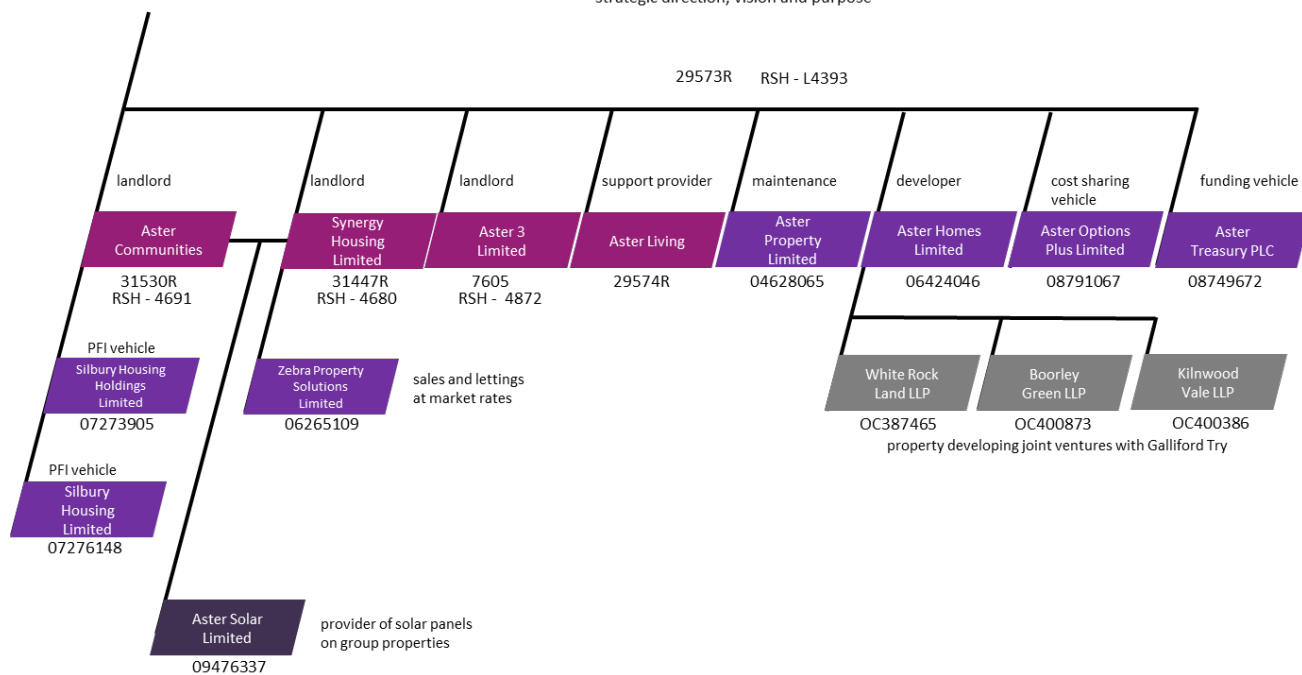
Our approach to modern slavery is reflected in our culture of trusting, respecting and empowering people.

Aster Group

We are working towards our vision of ensuring everyone has a home. Our purpose is to provide safety and security through our reliable landlord and independent living services, and we supply a wide range of housing options in response to the housing crisis. Founded in 1990, today the Group manages over £1bn of property assets and employs over 1,000 people.

We operate as a not-for-dividend business, aiming to generate a financial surplus each year that we can reinvest back into our organisation – with a focus on building more new homes. We are spending £1.5bn on new housing development programme over our seven-year plan, across a mix of tenure types, which will see us build approximately 10,000 homes.

As well as Aster Group Ltd (29573R), this statement covers all the subsidiaries detailed in the diagram below:



Key to entity types

- Charitable Registered Societies
- Non Charitable Companies
- Joint Venture
- External Joint Venture

Details of 7 dormant companies available on request

V4.4

Our supply chain

Our supply chain is varied and falls into the following main areas:

- Development – our property construction business
- Asset Management and Maintenance – management and maintenance of our property portfolio
- Housing, Care and Support - community care and support services for our customers
- Aster Group – central functions which support the business.

We typically spend 60 – 65% of our annual revenue with our suppliers, equating to circa £100m per annum.

Our procedures:

- All of our suppliers are required to comply with the modern slavery legislation through our terms and conditions, which are issued with every purchase order
- We provide all partners with policies which clearly communicate our expectations regarding sustainability, anti-corruption and bribery, ethical procurement, corporate and social responsibility - including non-discrimination, monitoring of working hours and prohibition of child and or forced labour
- Our internal Speak Up policy empowers our employees to raise concerns for independent investigation

- We ensure all agency employees have the appropriate eligibility to work, before pre-employment checks are completed.

Providing assurance

During the financial year 2018 - 2019 we have provided assurance that we are complying with the Modern Slavery Act by:

- Undertaking due diligence when considering appointing new contractors via our in-TEND Approved Supplier list process
- Updating and issuing our internal compliance policy to all of our managers, which was supported by internal communications
- Ensuring there is a process to raise and resolve any compliance issues via our internal People, Projects, and Resources Panel.
- Discussing this topic with contractors during review meetings
- Requiring compliance with our policies at supplier selection, during on-boarding, and through risk analysis, performance measurement and continual assessment.

A handwritten signature in black ink, appearing to read 'D Betteridge', with a stylized, cursive script.

David Betteridge

Company Secretary