

Anti-Modern Slavery Statement

2024/25

Our anti-slavery and human trafficking statement reflects our commitment to acting ethically and with integrity in all our business relationships.

We have a responsibility under the Modern Slavery Act 2015 to ensure transparency in the provision of all our goods and services. This statement outlines the actions and steps taken by A2Dominion. We will seek to ensure slavery and human trafficking is not occurring anywhere in our business or supply chains.

Policies

All our policies are reviewed on a regular basis to ensure that they reflect anti-slavery and human trafficking best practice and to mitigate against risks. Relevant key policies include, but are not limited to:

- Code of Conduct
- Procurement Procedure
- Recruitment
- Safeguarding Adults
- Safeguarding Children
- Whistleblowing.

Employees

We are committed to ensuring that our employees and workers are not subject to any form of servitude, forced, compulsory, or bonded labour. Employees will have the freedom to leave freely and without threat to themselves or their family.

All our employees will be treated fairly and equally. We regularly review all our terms of employment to ensure that they comply with all relevant legislation.

As an employer we are committed to paying the national living wage as a minimum. Employees are provided with clear and transparent information about rates of pay, hours worked, and legal deductions.

Procurement and Supply Chain

A2Dominion procures services and products directly and through our partnerships and contractual relationships with other suppliers and agencies. These are sourced from the UK, Europe, and beyond. A2Dominion does not wish to support or deal with any business that is knowingly involved in slavery or human trafficking in any part of its operations.

To that extent, A2Dominion includes within its tender documentation, a requirement for potential suppliers to provide a statement of assurance regarding its procedures and practices around modern slavery. In addition, we check for compliance with the Modern Slavery Act in our procurement supplier questionnaire when going out to market via tender.

A2Dominion will continue to review its procurement policies regarding tenders and contracts to ensure they reflect current legislation and best practice and to mitigate against the risk of modern slavery.

This Year

Corporate & HR

- Safeguarding, slavery and human trafficking training is mandatory for all colleagues (a new starter requirement). 95% of eligible colleagues have completed the training and associated test. The training supports awareness and ensures staff and teams conduct business that is consistent with our statement and Safeguarding Strategy.

Construction

- In previous years, construction was identified as an area of high risk for A2Dominion.
- A2Dominion are no longer carrying out any direct-build construction work and we no longer have a Construction team, therefore the risk of modern-day slavery has been reduced significantly.
- In any case, for any contractors procured in the future via the A2D contractor framework, the 'rights to work' and 'modern slavery statement' requirements are included within the pre-qualification questionnaire

Strategic procurement and supply chain

- We continue to ensure all tenders over £50,000 value which are executed through Strategic Procurement are required to produce an anti-modern day slavery annual statement.
- We are subject to our Procurement team's tender terms & conditions including the requirement to produce a modern-day slavery annual statement if needed.

- When onboarding suppliers, we ask them to comply with the Standard Terms for Purchasing Goods & Services. We have included a section regarding compliance with section 54 of the Modern Slavery Act 2015 on our New Supplier Registration form.
- Our due diligence on supply chain slavery statements is included within the tender process.
- Introduction of the Procurement Act 2023 replaces existing procurement regulations and introduces significant reforms with a stronger emphasis on transparency, accountability, and public reporting on contract performance and payments. As a result, A2Dominion is strengthening procurement processes, and in particular:

New supplier requirements:

- Large contracts (above Public Contracts Regs threshold): process complete, as the pre-qualification stage gives us the right to reject companies without a modern-day slavery statement
- Smaller contracts: we ask companies to supply either proof of compliance with section 54 of the Modern Slavery Act 2015 (if the act applies to them) or what safeguards they have in place. Smaller companies (those with turnover of less than £36m) are not required to comply with section 54 of the modern-day slavery act so we do not have this assurance and need to manage on a case-by-case basis.

Terms and conditions and code of conduct:

- A2Dominion's standard terms and conditions explicitly include an obligation on our suppliers to comply with the 2015 Modern Slavery Act. These terms and conditions are on the A2Dominion external website. A Code of Conduct is being introduced into future tenders as appropriate. The Procurement team are currently reviewing their processes and will ensure that the Code is consistently applied as part of the review.
- The refreshed Code of Conduct is drafted but has not yet had EMT approval. Pending this the National Housing Federation's Code of Conduct will be applied where relevant.
- Early stages of implementation are underway with training and guidance regarding the framework having been developed.

Framework and accreditation:

- We have re-evaluated this action and achieved the Chartered Institute of Procurement Supply: Corporate ethical procurement and supply accreditation. The original intention was for this to be renewed in Autumn 2023, but we aim to complete this by the financial year end 2025/26.

Property services and homes and communities

- All identified actions were completed in 2020/21 and our AMDS work is now incorporated into business-as-usual work across operations, for example contractor checks, training and work with contractors (particularly environmental services).

Specialist housing

- We have ensured agency staff working within Specialist Housing have undergone safeguarding training and that DBS checks have been carried out when requesting staff profiles.

Future Plans

In 2019, we created an improvement plan which provided robust and effective action planning and underpins our Anti-Modern Day Slavery Statement (AMDS). The improvement plan was based on our understanding of our own supply chains and identified associated risks.

Our plan was first prepared based on in-depth reviews of six key departments:

- One high risk area was within Construction where labourers are used. As outlined above, A2Dominion are no longer carrying out any direct-build construction work and we no longer have our own Construction team
- Five medium risk areas are Care & Support; Strategic Procurement; Business Support/ Commercial; Property Services and Housing, where consultants, specialist agencies, contractors and third party agencies are used.
- All other departments were deemed low risk, with no further action required.

This led to us identifying 17 projects to help us improve our commitment to anti-modern day slavery and human trafficking. At the start of 2023/24, the vast majority of projects were either complete or mainstreamed into business as usual. Construction and Procurement were identified as priorities where two projects were being progressed. As at 2024/2025, only one project remains in progress, which is the improvement in our approach to procurement.

In 2025/26, we will review and update our action plan to enhance our compliance, in line with government guidance¹, structured around the following:

1. Organisation structure and supply chains
2. Policies in relation to slavery and human trafficking
3. Due diligence processes
4. Risk assessment and management

¹ <https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement#what-to-include-in-a-modern-slavery-statement>

5. Key performance indicators to measure effectiveness of steps being taken
6. Training on modern slavery and trafficking

Declaration

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's slavery and human trafficking statement for the financial year ending 31st March 2025.

This statement is reviewed and updated on an annual basis and has been approved by A2Dominion's Group Board. It applies to A2Dominion Housing Group Ltd and its relevant subsidiaries.



Ian Wardle
Chief Executive

30 September 2025