

Modern Slavery and Human Trafficking Statement

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year ended 31st July 2024.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”) and sets down Weston Group’s commitment to preventing slavery and human trafficking in our business activities and the processes we have in place, with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. The business is alert to risks, whatever the size, and our members of staff will report their concerns to Weston Group’s management so that they can be acted upon to preserve the company’s zero tolerance approach to any form of modern slavery.

Overview of our Organisational Structure

Weston Group is made up of Weston Homes Plc, Weston Business Centres Limited, Stansted Environmental Services Limited, Weston Logistics Limited, and British Offsite Limited¹.

Weston Homes Plc is a leading property developer operating in the South East of England and divided into two divisions (London & East Anglia and London & South West), dealing with developments in the area in which it operates. Weston Business Centres Limited is a provider and manager of serviced offices accommodation. Stansted Environmental Services Limited is a multi-disciplined environmental consultancy service provider, which operates within the UK only. Weston Logistics is a plant and mechanical machinery company based near Head Office which supplies the Group’s subsidiaries with the required plant and mechanical machinery. British Offsite Limited is a Modern Methods of Construction (MMC) and logistics business which is operational with the UK. No companies in the Group currently operate outside the UK.

Supply Chain

Weston Group’s supply chain is comprised of hundreds of third-party suppliers, contractors, and sub-contractors on whom we rely to help in executing our development projects and business endeavours through the supply, by these organisations, of goods and services. Each of these third parties vary in size from large companies to individual tradesmen and is predominantly UK-based with some material suppliers based overseas.

Procurement of these third-party goods and services is dealt with by each of the companies, who utilise known suppliers, which can vary depending on location and market conditions.

Policy

Weston Group recognizes its moral and ethical responsibilities to do all it can to ensure

¹ Although not all companies have crossed the 36 million turnover threshold for declaration they have been included for completeness as this statement applies to all companies within the group.

that its businesses and supply chain is slavery free and takes a zero-tolerance approach to any form of modern slavery. The Modern Slavery policy outlines this approach and sets out what actions are taken should modern slavery or human trafficking take place within the group or its supply chain. The modern Slavery policy is complimented by internal policies including those that govern and control:

- Whistleblowing
- Anti-Corruption and Bribery
- Harassment and Bullying
- Proof of Right to Work
- Equality and Diversity
- Modern Slavery & human trafficking
- Health & Safety

These are reviewed and updated on a periodic basis.

Due Diligence

Due diligence as to the third parties' compliance with Weston Group's policies and procedures is managed by a central team based at Head Office and is a continuous process reviewed periodically with each contractor.

If considered necessary, the Group may ask certain suppliers to produce an annual slavery and human trafficking report, setting out the steps they have taken to ensure slavery and human trafficking is not taking place in any part of their business or supply chain.

Risk Assessment

The Group considers the overall risk for modern slavery and human trafficking to be low due to the protocols and procedures currently in place. The risk assessment is based on the following criteria:

- Products and services which use low skilled labour
- Reliance on temporary and transient labour
- Potential for materials to come from high-risk countries

As such trades such as landscaping, security, groundworks, and cleaning have been identified as risk trades.

Some of Weston Group's suppliers, contractors and sub-contractors are smaller businesses and are not required in law to make formal declarations relating to the Act. Weston Homes recognizes that these entities, along with their suppliers and sub-contractors present the most risk to its business in relation to the Act in the UK. Many of these risks are mitigated by the enhanced due diligence being implemented at Head Office, with particular focus on the Company's top 20 Sub-Contractors (measured by value of the business placed with them).

With regards to materials the business uses in its developments, some of these are procured from suppliers outside of Europe, and Weston Group acknowledges that there is a risk of modern slavery in this 'upstream' supply where human rights legislation may be less stringent. When the business engages with suppliers of materials outside of Europe

who we have not used before, we arrange for a specialist agency in that country to visit our potential supplier to review their operations, as part of a due diligence exercise, to ensure that their working practices suit Weston Group's strict business principles, and then provide the business with a report on their findings.

Actions taken to Combat Modern Slavery

Before a third-party can trade with the Group a due diligence review is conducted on all new third-parties before being able to trade with the group. Should any third-party be found to be in breach of the Modern Slavery policy the business reserves the contractual right to terminate any supplier contract in the event of a breach of any legislative requirement which includes modern slavery.

The confirmations the business requires from all preferred suppliers are:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- They pay their employees at least the national minimum wage/national living wage (as appropriate); and
- The business may terminate the contract at any time should any instances of modern slavery come to light.

Training and awareness

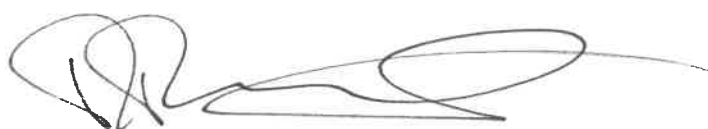
The Group provides training for all its staff so that they understand the signs of modern slavery and what to do if they suspect that it is taking place. Refresher training takes place at regular intervals and when deemed necessary.

Performance Indicators

Weston Group is able to report that the effectiveness of the steps being taken to ensure that slavery and/or human trafficking is not taking place within its business or supply chain would be tested against:

- The number of reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified; or
- The number of reports received from the group's supply chain to indicate that modern slavery practices have been identified.

This statement was approved by the Board of Weston Homes Plc on 27th September 2024.



Robert Weston, Group Chairman



Peter Gore, Chief Executive Officer