

## Persimmon Group Modern Slavery Transparency Statement

### Introduction

This statement sets out the steps taken by the Persimmon Group to prevent modern slavery and human trafficking within the Group's business and its supply chain, and is published pursuant to the requirements of Section 54 of the UK Modern Slavery Act (2015). The statement covers all entities of the Persimmon Group, including Persimmon Plc, Persimmon Homes Limited, and Charles Church Developments Limited.

The statement has been structured to align with good practice as outlined in Home Office guidance (Transparency in supply chains: a practical guide) and to clearly set out the measures in place within the Group, further steps taken within 2023, and its strategy for continuous improvement in 2024 and beyond.

### Organisation structure and supply chain

#### Business model

Persimmon is one of the UK's leading housebuilders. Our business model involves identifying and investing in suitable land, and the design and build of good quality new homes at a range of price points across the UK. The Group is strongly focused on operating as a responsible developer, with safe working practices a key priority, delivering high levels of customer service, and building sustainable communities.

#### Organisational structure

The Group operates through twenty-nine regional housebuilding businesses that build homes across England, Scotland and Wales. These are supported by the Group's three manufacturing businesses; our Space4 business near Birmingham produces timber frame products, in addition to our Brickworks and Tileworks facilities at the Group's manufacturing hub in Harworth, near Doncaster. The Group also operates through Persimmon Direct, which provides directly employed groundworks and joinery services to support a small number of our regional businesses, and our Internet Service Provider business, FibreNest. On average across 2023, the Group directly employed 4,825 staff, with the remainder our workforce being composed of sub- contracted labour (see below).

#### Supply chain

The Group's business model requires a consistent supply of high-quality materials and a skilled sub-contractor base. Our housebuilding operations involve c. 5,900 suppliers, the overwhelming majority of which are UK based, although some materials or components sourced by our suppliers may originate from outside the UK. Previous analysis of our supply chain has indicated that around 11% by volume of our suppliers sourced a portion of the goods they supply from overseas, the majority of which were from EU states. Internal analysis indicates that a small proportion of the goods we purchase, or components within these goods, originate from geographies that do not have such well-established frameworks and have a heightened risk of modern slavery (as determined by Global Slavery Index).

Our Group Procurement department, organises and negotiates Group-wide contracts for all construction materials with national supply chain coverage. Group Procurement works closely with suppliers to ensure they maintain appropriate controls to prevent and detect modern slavery and if under contract, report on their compliance to their equivalent policies or statement.

The Group also engages a significant number of sub-contractors, all of which are UK based. These range in size, from individual tradespeople to large sub-contractors in disciplines such as groundworks, which may have operations across the UK.

### Group commitments on modern slavery and human trafficking

The Group has adopted the definition of modern slavery and human trafficking as outlined within section 54 of the Modern Slavery Act (2015).

We are committed to the fair treatment and respect of all our stakeholders, including our employees, workers, sub-contractors, and suppliers. This includes adoption of good labour practices consistent with the eight fundamental conventions of the International Labour Office (ILO), as manifested by our continued status as a Living Wage Foundation accredited employer (see steps taken in 2023 below).

We are committed to taking the strongest possible measures to prevent the occurrence of modern slavery and human trafficking within both our immediate operations and our supply chain. This includes acting swiftly and decisively on any of the indicators of forced labour as set out by the ILO, such as abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions and excessive overtime. The Group has established supporting policies setting out how we do this, including our Supplier Principles, Human Rights Policy, Code of Ethics, and Anti-Bribery and Corruption Policy, all of which are available on our website.

### Assessing the risk of modern slavery

The Group's Sustainability Committee monitors the risks of modern slavery and human trafficking and reviews these on an annual basis. The identification and assessment of risk is based on an assessment of the Group's comprehensive risk registers, with scoring of risk on impact and likelihood ratings. This is complemented by analysis of external sources of data, including publications from Global Slavery Index and materials obtained via the Gangmasters and Labour Abuse Authority (GLAA) Construction Protocol, to which the Group is a signatory, and engagement with other industry forums on modern slavery.

Two main risk areas have been identified from the Group's risk assessment. First is a risk of non-compliance by sub-contractors with labour related legislation, which could result in modern slavery affecting our on-site operations. Second is the sourcing of a small minority of our construction materials, or components within certain items, that may originate from nations with a higher exposure to modern slavery risks, as determined by Global Slavery Index. In 2023 we were notified of a risk of forced labour in the manufacture and supply of polysilicon in the Xinjiang region of China. This region is the source of 40% of the world's solar grade polysilicon for PV cells with UK supply identified as a major exposure risk. Action was taken through our procurement controls.

The Group is committed to maintaining effective controls to mitigate these risks and in being proactive in raising awareness of modern slavery issues among our employees, suppliers and sub-contractors. Our assessment is that, taking into account the mitigating controls and due diligence measures of the Group, the overall residual risk is low. Within 2023, there were no reports of modern slavery or labour abuse within the Group's operations (in 2022 one case was identified via whistleblowing which related to potential modern slavery within a sub-contractor's workforce. This report was reviewed internally by Group Internal Audit, and all available information shared externally with the GLAA. There was insufficient evidence to substantiate the report and no further action to be taken).

### Business and supply chain due diligence

#### Within the Group

The Group has established procedures to confirm all employees and labour-only sub-contractors are eligible to work in the UK. Our management systems and controls, supported by periodic audits and data analysis from our Group Internal Audit department, help to

ensure that our businesses adhere to our procedures and legislation. This includes those concerning working conditions, working hours, and obligations on rates of pay as a Living Wage Foundation accredited employer.

Our staff, suppliers and sub-contractors are required to remain vigilant to any unethical practices, including any concerns around modern slavery. We maintain a culture of openness where concerns can be reported freely, either through routine line management or through employee engagement mechanisms. Modern slavery training programmes are in place, and awareness posters have been issued to all sites and offices. A whistleblowing provision is maintained for the anonymous reporting of concerns, with details of how to report concerns displayed on posters in all sites and offices. All whistleblowing concerns are investigated by our Group Internal Audit department and reported to the Board via the Audit & Risk Committee, regardless of whether proven or not.

### **Suppliers and sub-contractors**

The vast majority of the Group's suppliers and sub-contractors are either UK based entities or are UK subsidiaries of large international companies. The Group has built long-term relationships with its suppliers, who also serve many industry peers and there is a collective interest to ensure compliance with the modern slavery requirements.

Most of the goods we buy are produced either in the UK or in jurisdictions that have well established frameworks for stakeholder protections. As noted elsewhere within this statement, a small proportion of materials procured originate from outside such jurisdictions. Where these are identified, either through routine supplier due diligence or through periodic internal audits, assurances are sought from suppliers to ensure appropriate safeguards are in place on the ethical sourcing of the materials. This includes assessment of modern slavery statements and other publicly available documents, and discussions with the suppliers. In August 2023 we were notified of a risk of forced labour in the manufacture and supply of Polysilicon in the Xinjiang region of China. This region is the source of 40% of the world's solar grade polysilicon with UK supply identified as a major exposure risk. To mitigate the risk within our supply chain, all solar suppliers to Persimmon were instructed to carry out due diligence of their supply chain and provide evidence of the process. One supplier was unable to demonstrate an audit had been conducted following the notification of the risk and removed from our list of approved solar manufacturers.

Our suppliers must agree to our terms and conditions, which includes adherence to our Supplier Principles. Our Supplier Principles require suppliers to comply with all relevant labour related legislation in the countries in which they operate, including those relating to working hours, employee wages and benefits, and that our suppliers must not engage in business practices that may be considered unethical or corrupt. Modern slavery provisions and right to audit are also included in our Framework Agreements, and Quarterly Business Reviews are held with Framework Suppliers and Merchants where modern slavery is an agenda item.

The Group's sub-contractor terms and conditions also include provisions on modern slavery awareness, training and reporting protocols for any concerns identified or observed in the performance of their work. Additionally, as part of our commitments as a Living Wage Foundation accredited employer, we have undertaken to implement Real Living Wage obligations into our standard terms and conditions as agreements are renewed.

### **Training and workforce awareness**

The Group continues to emphasise the importance of training to boost workforce awareness of modern slavery risks. A range of training courses are in place, tailored to different roles and the potential exposure to modern slavery risks. To address workforce risk, we have developed detailed training for our Site Managers and use toolbox talk sessions derived

from GLAA materials for our site-based workforce (including sub-contractors). In addition, we have introduced specific training for our Commercial and Procurement teams to improve awareness of modern slavery risks within our supply chain. At the time of reporting 87% of staff required to undertake modern slavery training had completed the course within the past 24 months. This is an on-going process with the training module now being attached to new members of staff as part of their Learner Management Programme, and existing staff to refresh every 2 years. Modern slavery is now a key section of our site managers' Essentials Induction Programme available to all site management staff as well as a stand-alone module remotely delivered training session for site teams.

### Steps taken in 2023

Within the year ending 31 December 2023, the Group took a number of actions to enhance its control environment in respect of modern slavery prevention:

- **Real living wage**  
Persimmon retained its Living Wage Employer status in 2023 from the Living Wage Foundation. The Group had been paying its own directly employed staff the Real Living Wage since January 2019 but extended this commitment to include its sub-contractor workers.
- **Industry initiatives**  
The Group has continued to actively participate within GLAA Construction Protocol community, ensuring key staff remain up to date with trends and intelligence relating to modern slavery, and adopt further areas of good practice where required. In 2023 the Group has also engaged proactively with the CCLA-led 'Find it, Fix it, Prevent it' initiative, to benchmark its processes and understand stakeholder concerns for our sector. Informed by these inputs, a comprehensive suite of controls has been established. This includes regular audits on supply chain controls and awareness, led by our Group Internal Audit department.
- **Training and awareness**  
Training remains a key area of the Group's focus. Within 2023, the Group provided greater access to modern slavery training materials through an on-line Learning Management System. As part of a review into mandatory compliance courses, modern slavery training was extended, and e-learning assigned to senior managers. The training modules incorporate materials and videos from the Sustainability Supply Chain school. Awareness posters are also in place at all sites, encouraging the reporting of potential concerns via our whistleblowing provision. Routine inspections and worker interviews are carried out by the Group HS&E department, and tailored training is in place for employees in Commercial, Procurement and Construction functions, in addition to the annual delivery of a GLAA developed 'Toolbox Talk' for all site-based workers.
- **Reporting concerns**  
Within the year, enhancements were made to the Group's whistleblowing provision, as part of an ongoing action plan developed after a 2022 benchmarking exercise performed with the support of Protect, the whistleblowing charity. These have included the appointment of a Board level whistleblowing champion, and continuous improvement of the trend analysis and reporting of concerns to the Audit & Risk Committee.
- **Standardised programmes of inspection**  
To ensure site awareness of modern slavery risk, as part of their routine programme

of site inspections, the Group Health, Safety & Environment team performed checks on all sites in August 2023 to ensure modern slavery awareness and reporting signage was in place on development sites, and spot check awareness with site operatives.

The Group Internal Audit department performs an annual audit on modern slavery controls, which reviews training and policy awareness, supply chain controls (such as material supplier selection and on boarding, contractual provisions, and visits to manufacturing facilities) and follow-up on prior year audit actions. The audit methodology is designed to reflect considerations from various sources of good practice, including those published by the CCLA, and to be repeatable in order to measure progress each year. The results of this audit are reported to and reviewed by the Board through the Audit & Risk Committee. The 2023 review provided assurance that the Group's controls were working effectively, with no material issues identified.

### Strategy and steps to be taken in 2024

The Group remains committed to finding, fixing and preventing modern slavery within its operations and its supply chain. In addition to maintaining measures introduced in 2023 (see above), the strategy for continuous improvement will include the following measures for 2024 and beyond:

- **Standardised programmes of inspection**  
The programme of site inspections by the Group Health, Safety & Environment team will continue for 2024 to ensure modern slavery awareness on development sites. As part of their routine programme of site inspections, the Group Health, Safety & Environment team will perform checks to ensure modern slavery awareness and reporting signage is in place on development sites, and spot check awareness with site operatives through worker interviews.
- **Routine operational and supply chain internal audits**  
The Group Internal Audit department will continue to deliver standardised annual programme of audits. The scope of these audits focuses on aspects of supply chain due diligence (including visits to production facilities of selected material suppliers) and site operational processes, in order to provide assurance on their effective operation on controls to prevent modern slavery.
- **Training & Awareness**  
Established training and awareness programmes are in place for sites and key commercial teams. Materials will be reviewed to ensure up to date content.

Site modern slavery signage on all sites will be maintained and included in all induction materials. This will help to ensure a high level of awareness on how to spot the signs of modern slavery and how to report concerns.

Updates and intelligence from the GLAA and other sources of good practice will be routinely reviewed. This will include engagement with industry forums such as those led by the CCLA, with pertinent information from such engagement communicated to operating businesses and commercial and procurement teams to ensure ongoing awareness.

### Performance monitoring and assessment of effectiveness

The Group's Sustainability Committee monitors the Group's modern slavery risks, together with the associated control environment and its overall performance, and provides updates

to the Board through the Audit & Risk Committee where necessary. Performance monitoring includes indicators such as training hours and reports of any modern slavery concerns. The Director of Internal Audit attends the Committee on an ad hoc basis to provide updates from the GLAA or in response to any incidents or concerns reported via the Group's whistleblowing provision.

The Board has reviewed the Group's control environment and training provision, the ongoing plans to develop these further, and the processes to monitor performance routinely through the Group's Sustainability Committee and Audit & Risk Committee. It is considered that these measures provide a broadly effective mitigation of modern slavery risk within the Group's operations and immediate supply chain. The Group will continue to keep its practices, procedures, and training programmes under review to ensure ongoing effectiveness and continuous improvement.

**Approved by the Board**  
**Dean Finch**  
**Group Chief Executive**  
**June 2024**