### Modern slavery and human trafficking statement

#### Introduction

As a charitable provider of social housing, we hold as a core value the importance of conducting business in an ethical way. This is reflected in our strategic plan and policies and is supported by our code of conduct. We do not tolerate any behaviour that undermines our regulatory and legal obligations and are committed to improving our practices to combat slavery and human trafficking.

### Stonewater's structure

Stonewater is a social housing provider that provides good quality, affordable housing to people whose needs are not met on the open market. Our values are built around being ethical, ambitious, passionate, agile and commercial. We are made up of several member companies. The parent company is Stonewater Limited and the group also includes Stonewater (5) Limited, Mount Green Housing Association Limited, Stonewater Commercial Limited, Stonewater Developments Limited, Stonewater Procurement Limited and Stonewater Funding plc. We have approximately 950 employees and operate in England, where our registered office is also situated. The Group has a global annual turnover in excess of £36 million (£269 in 2024/25). Further details on our structure can be found at About Us section of our website.

# **Our Supply Chains**

Our supply chains include building contractors and home maintenance contractors, as well as suppliers of goods and services to our central functions. Through our procurement procedures, of which an internal audit yielded a positive report with no concerns raised, we seek to appoint contractors, consultants and suppliers whose values align with our own and who operate according to the same high ethical standards. Our selection criteria take account of both quality and price. We seek to award each contract at a price that will allow fair wages and deter human trafficking and the use of child labour.

### **Our Policies**

We value people and are committed to doing the right thing. This is reflected in our procurement and colleague recruitment arrangements and is supported through our governance policies. These include commitments to equality, diversity and inclusion, health & safety and to integrity in our business relationships. We encourage colleagues to report any suspicions of malpractice; this is documented in our whistleblowing policy and supporting procedures.

## Due diligence processes for slavery and human trafficking

We seek to mitigate the risk of slavery and human trafficking occurring in our supply chains, through both our procurement processes and the ongoing contract management arrangements. Our standard contractual terms and conditions include a requirement for contractors and suppliers to confirm the action they are taking to eliminate slavery and human trafficking it their supply chains. When identified, training is provided to stakeholders who are involved in procurement at all levels.

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

Signed: Sheila Collins, Chairman

Approved by Stonewater Limited board: 28 May 2025