# **TRANSPARENCY STATEMENT – MODERN SLAVERY ACT 2015**

## Policy

## The Higgins Group PLC Anti-Slavery and Human Trafficking Policy

Higgins Group PLC is committed to ensuring that there is no modern slavery and human trafficking in our business or in our supply chain. The company is fully supportive of the initiative to extinguish modern slavery from the construction industry and to the principles of the Modern Slavery Act 2015 and the promotion of transparent and ethical business practices.

#### The Higgins Group Structure

The Group, founded in 1961, consists of two aligned operating companies, Higgins Homes and Higgins Partnerships 1961 PLC. Higgins Home secure strategic, unconditional and consented land and development opportunities for the purpose of delivering award winning private housing. Higgins Partnerships deliver complex projects in collaboration with Investors, Developers, Registered Providers and Local Authorities. Combined, the Company employ 356 employees.

## **Higgins Group Statement**

This statement defines the strategies employed by Higgins Group PLC to prevent modern slavery and human trafficking from occurring in our business, or in our supply chain and in accordance with requirements of the Modern Slavery Act 2015.

In 60 years of trading, we have developed strong relationships with our selected supply chain, and they have a clear understanding of the standards we expect.

Higgins Partnerships 1961 PLC operates an integrated management system designed in accordance with ISO 9001 and is audited by the BSI for compliance on a regular basis and the audit results reviewed by the Directors.

Potential new supply chain partners are reviewed through a PAS 91 aligned questionnaire and vetting process in order to be considered an established member of our supply chain. This process will include a review of key policies.

We have modified our site induction process for all persons presenting for work to include an invitation for any worker to raise personally and in confidence with the inductor any concern that they may have regarding their employment conditions whilst confirming their right to work in the United Kingdom. No one may work on our sites until they have been through this induction.

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Our Code of Conduct policy makes clear to employees the actions and behaviour expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing the supply chain.

All employees of Higgins Group are required to complete a mandatory 'Modern Slavery' training course to raise awareness, to be able to identify the signs of modern slavery and to encourage reporting of any concerns throughout the business.

In addition, our sub-contracts now include a provision which demands that they are able to demonstrate to us that they have in place ethical, non-discriminatory and fair employment practices when engaging workers.

We are committed to the maintenance of our existing internal controls to address the issue of modern slavery and human trafficking and the continual review and improvement of our systems to ensure that our business dealings are undertaken ethically and with integrity.

1<sup>st</sup> May 2025 by the organisation's Chief Executive Officer, Mr. Declan Higgins.

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