

Slavery and Human Trafficking Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Believe Housing Limited (believe housing) for the financial year ended 31 March 2025. Our annual turnover exceeds the £36m threshold for this reporting.

Our business

We are an exempt charity and a Community Benefit Society, focused on providing healthy and affordable homes and enhancing the communities we serve. believe housing is one of the largest housing associations in North East England. We manage more than 18,000 homes, supporting around 22,000 customers. At believe housing we agree that our core values are to do the right thing for our customers, for our colleagues, and for our business.

In March 2025 the Board approved the 2025–2026 Corporate Plan, which set out our ambitions for the next three years to deliver against our aims, which are to:

- deliver excellence for our customers and play a positive role in our communities;
- be a great place to work with a flexible, high performing workforce who do the right thing
- be financially secure and well governed, adapting to challenges, while meeting the evolving needs of our customers.

Our policies relating to slavery and human trafficking

‘We believe in life without barriers’ is our vision and to achieve this we operate our business to the highest moral and ethical standards.

We are committed to the principles of the Modern Slavery Act and recognise we have a responsibility to do our utmost to tackle modern slavery and human trafficking. We take a zero-tolerance approach to human trafficking and slavery throughout our business.

Safeguarding policy

Our safeguarding policy highlights that modern slavery is a form of abuse and must be dealt with as such. Our policy clearly sets out the roles and responsibilities for all colleagues across the organisation to deal with concerns or disclosures of abuse (including modern slavery). All colleagues are required to read this policy and there is a training programme in place for all relevant teams across the organisation. Our Urgent Support Team takes the lead on safeguarding across the organisation, investigating and taking action to address

concerns that are raised by colleagues across the business, or by external stakeholders if there are concerns relating to tenants in any of our properties.

Tenancy Management Policy

Our Tenancy Management Policy sets out that regular tenancy visits are undertaken, which aim to ensure that tenants are adhering to their tenancy agreement. This includes that the legal tenant and their household are living in the property and that it is not being used for illegal purposes (for example, modern slavery).

Colleague policies

We employ over 600 colleagues and recognise the potential for slavery and human trafficking to affect employees across the business. We have robust policies and procedures in place to ensure colleagues are treated with dignity and respect and support our approach to equality, diversity, and inclusion. Our Code of Conduct, which all colleagues must sign up to, requires compliance with all relevant legislation, which includes the Modern Slavery Act. We have a specific policy in relation to whistleblowing which, while not focusing specifically on modern slavery and human trafficking, sets out the process concerned colleagues and Board members can use to report any concerns of wrongdoing involving the organisation or its staff.

Through our recruitment processes and employment contracts we ensure that:

- all colleagues have the right to work, and pre-employment checks are completed
- everybody receives fair pay, and we adopt the minimum living wage standards
- all agencies and other bodies we use as part of our recruitment process have procedures to prevent modern slavery.

See it, own it, report it

See it, own it, report it is the basis for our 'eyes wide open' campaign, which continued in 2024/25 with a particular focus around neighbourhoods and safeguarding. The campaign asks all colleagues to keep their eyes wide open when entering a customer's home or visiting our neighbourhoods, with a number of tell-tale signs and things to look out for. There are numerous ways to report any concerns if they feel something is amiss, including our 'Something not right' form on our intranet. This campaign has been important in supporting us to identify concerns, particularly around safeguarding and modern slavery.

Our commercial properties

We have a small number of commercial units in our neighbourhoods, which are let to businesses. Our commercial tenancy agreements include a covenant that the tenant must adhere to lawful use of the property. This is monitored through annual inspections of the properties and if any unlawful business (including human trafficking or slavery) is suspected, the police are notified. Where any suspicions of illegal activity are proven the necessary legal steps would be taken to terminate the lease.

Our supply chains

We procure a wide range of goods and services through a varied supply chain, including:

- property-related services and materials, including development of new homes
- facilities management services
- IT and digital equipment
- professional services
- office services, equipment and supplies
- utilities
- housing management services and supplies.

Our central Procurement Team supports the business, using category management processes and procedures to provide a robust framework for both procurement activities and contract management arrangements. Our category managers work closely with their assigned parts of the business to ensure appropriate contracts are in place for the provision of required goods and services and that contracts are managed to ensure required performance is delivered. Included within the performance management framework are onsite visits with suppliers to ensure that contract standards are met in practice. These are the main mitigations in addressing modern slavery in our supply chain.

We work with a wide range of suppliers, some of whom subcontract work to other suppliers. Some of our suppliers also utilise recruitment agencies to supply temporary or permanent staff. We work closely with our suppliers to ensure they are aware that we expect them to meet our minimum standards and comply with all local and national laws and regulations, including the Modern Slavery Act.

Due diligence processes for slavery and human trafficking

We require all potential new suppliers to complete an equality, diversity, and inclusion self-assessment to confirm their compliance with relevant national and international legislation. We require all suppliers to match our commitment to equality, diversity, and inclusion in employment practices and service provision and this includes modern slavery and human trafficking.

We ask suppliers contracting with the organisation to ensure that they adhere to their obligations in respect of, amongst other things, equitable treatment of employees. Should suppliers not meet our standards, or refuse to work towards meeting our standards, then we may refuse to do business with them.

Areas of operation at risk of slavery and human trafficking

We are a UK-based organisation with all of our business activity taking place across the North East of England.

We believe that the risk of modern slavery or human trafficking impacting our business or supply chain is relatively low. However, we recognise that current economic and social factors mean that this risk is heightened and therefore it is vital we remain vigilant. We have highlighted that there are some areas of our operations that are more vulnerable to modern slavery than others, particularly in relation to suppliers and sub-contractors for maintenance, repairs and construction works, and the renting of our commercial properties. Our contractual terms and conditions for suppliers and contracts make specific reference to safeguarding and the legal and ethical requirements in this area.

Effectiveness

Our policies and procedures will be monitored, and any areas of concern will be addressed. We continue to remain vigilant to the risk of modern slavery and have processes and procedures in place that allow us to continue to monitor our operations.

This statement was approved by the Board on 14 May 2025.

A handwritten signature in black ink, appearing to read 'Faye Gordon', is positioned above a horizontal line.

Faye Gordon, Executive Director of Finance and Investment