

Slavery and human trafficking statement

Introduction

Moat is fully committed to combatting slavery and human trafficking and is committed to ensuring transparency of our supply chains.

Outlined below are the steps we have taken to target Modern Slavery for the financial year ending 31 March 2018, along with details on the further actions we will take in the new financial year. We will continue to examine the effectiveness of our approach, to ensure continuous improvement.

Moat's structure and business

Moat Homes Ltd is an exempt charity, and Registered Provider of Social Housing (registered in England), principally involved in the provision of housing and support to people in need.

The Moat group consists of two registered providers and five non-registered entities. Moat Homes Limited (MHL) is the parent company of the Group and a charitable registered provider regulated by the Homes and Communities Agency (HCA).

Our mission is to be an innovative social business, expert in delivering homes and developing communities across the South East. We reinvest all financial surpluses to provide additional affordable homes and to provide quality estate management services which are reliable and offer value for money.

Moat owns and manages over 21,000 homes and employs over 350 staff. Our principal activities are the provision of general needs and affordable rent homes for people who cannot afford to rent or buy in the open market and the provision of low cost home ownership and shared ownership.

Provision of housing

As a major housing provider we have processes in place which monitor the people whom we house, as well as ensuring that our properties are not used for the purposes of trafficking or allowing modern slavery to be used.

Our supply chain

Moat operates principally in the South East of England: Essex, Kent, Sussex and South East of London. Our supply chains include goods and services for the construction, repair and maintenance of residential homes.

We also purchase goods and services to facilitate running our office premises. As we are based in and operate solely within the UK, we have identified that our overall exposure to the risk of slavery and human trafficking is quite low. However, within our business, particular attention should be paid to construction contracts and the use of sub-contracted labour. We already take action to ensure that we are compliant with employment law, and many of our contractors and suppliers are in the UK, and are also required to follow UK employment law.

We are committed to ensuring that there is no modern slavery in our supply chains or in any party of our organisation and as part of our initiative to identify and mitigate risk during procurement, either from a framework, or by buying direct from the open market, we have implemented and are enforcing, effective systems and controls. These include:

- A requirement for all suppliers tendering for new business and suppliers, to declare that they are not involved in modern slavery or human trafficking.
- The inclusion of additional wording within our standard terms and conditions of purchase, to ensure that the seller shall observe all legal requirements of the UK, EU and relevant international agreements in relation to social and labour law, and in particular the Modern Slavery Act 2015.
- Provision in our contract documentation requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains.
- All monthly Employers Agent reviews will include reference to the Modern Slavery Act as an agenda item.

Training

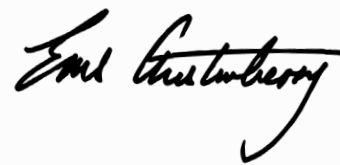
We continually seek ways to raise our staff's awareness of the risks of modern slavery and human trafficking via our learning programmes and our communication channels.

We will continue to provide relevant information and training to staff on the topic as part of our ongoing work to manage these risks. We will also continue to encourage our business partners to provide training to their staff and suppliers.

Non-compliance

Moat will only trade with those who comply with our policy on Modern Slavery (as defined in our Code of Conduct for partner organisations). We will assess any instances of non compliance and will take appropriate action.

Moat has a whistleblowing policy in place, which ensures full protection (and anonymity) of staff, should they raise a concern. This statement is made under section 54(1) of the Modern Slavery Act 2015. It is approved by Moat's Board and applies to all organisations within the Moat group.



Elizabeth Austerberry
Chief Executive