

Slavery and Human Trafficking Statement

For the Financial Year ending 31 March 2026

Introduction

Modern slavery is a serious crime and a violation of fundamental human rights. It can take many forms, including slavery, servitude, forced or compulsory labour and human trafficking.

Moat is committed to acting ethically, conducting business responsibly and playing our part in preventing modern slavery. We are committed to ensuring transparency across our organisation and throughout our supply chains, and we expect the same high standards from those who work with and for us.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken by Moat during the financial year 1 April 2025 to 31 March 2026 to prevent modern slavery and human trafficking within our organisation and supply chains, together with the actions we will continue to take to strengthen our approach.

About Moat

Moat Homes Ltd is an exempt charity and a Registered Provider of Social Housing, regulated by the Regulator of Social Housing.

The Moat Group consists of two registered providers (Moat Homes Limited and Moat Housing Group Limited) and one active company (Moat Homes Finance plc). Moat Homes Limited is the parent company of the Group.

We own and manage over 23,000 homes across the South East of England and employ approximately 500 colleagues.

Our Corporate Strategy, Homes that Build Futures, sets out our ambition to provide safe, affordable homes, deliver reliable services and help customers and communities thrive. Acting responsibly, protecting people from harm and working ethically are fundamental to achieving these aims.

Our approach

Preventing modern slavery is everyone's responsibility.

We seek to identify, prevent and respond to the risks of modern slavery through:

- effective governance and Board oversight
- responsible procurement and supplier management
- fair and lawful employment practices
- safeguarding and protecting customers
- colleague awareness and training
- partnership working with contractors, suppliers and statutory agencies.

We recognise that modern slavery can affect individuals in every community. We therefore seek to maintain an organisational culture in which colleagues feel confident identifying concerns, challenging poor practice and reporting potential risks.

Understanding our risks

As a housing provider operating solely within the UK, we consider our overall exposure to the risk of modern slavery to be relatively low. However, we recognise that risks remain within certain sectors and activities.

Areas where we consider there to be an increased risk include:

- construction and development
- repairs and maintenance services
- facilities management and cleaning services
- agency and subcontracted labour
- procurement of goods and services
- customers who may be vulnerable to exploitation.

We regularly review these risks and seek to ensure that appropriate controls remain in place across both our own operations and our supply chain.

Managing our risks

Procurement and supply chain

We are committed to working only with organisations that share our commitment to ethical business practices.

Our approach includes:

- Supplier Code of Conduct
- standard contractual terms referencing the Modern Slavery Act 2015
- due diligence during procurement
- ongoing contract management
- supplier monitoring.

Employment

Moat is committed to fair recruitment and employment practices.

We comply with UK employment legislation, undertake appropriate right-to-work checks during recruitment and ensure colleagues receive terms and conditions that comply with legal requirements.

We are committed to paying at least the National Living Wage.

Protecting our customers

As a social housing provider, we recognise that some customers may be at increased risk of exploitation.

Our safeguarding arrangements, tenancy management processes and partnership working help us identify and respond to concerns where modern slavery or human trafficking may be suspected.

Where appropriate, we work alongside partner agencies, including the police and local authorities, to protect individuals and report concerns.

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Colleague awareness

All colleagues complete mandatory modern slavery awareness training as part of their induction. This provides a baseline understanding of modern slavery, the indicators of exploitation and colleagues' responsibilities for identifying and reporting concerns.

We will continue to review our learning offer to ensure colleagues, particularly those in higher-risk or customer-facing roles, have the knowledge and confidence to recognise and respond to potential signs of modern slavery.

Speaking up

We encourage colleagues, contractors and partners to report any concerns relating to unethical behaviour, exploitation or modern slavery.

Our Speaking Up Policy provides a confidential process for raising concerns, and individuals can do so without fear of retaliation.

Supporting policies

This statement is supported by our wider governance framework, including:

- Procurement Policy
- Procurement Framework
- Supplier Code of Conduct
- Speaking Up Policy
- Grievance, Bullying and Harassment Policy
- Safeguarding Children Policy
- Safeguarding Adults at Risk Policy
- Domestic Abuse (Customers) Policy
- Domestic Abuse (Colleagues) Policy
- Code of Conduct
- relevant People (HR) policies.

Measuring effectiveness

We recognise that preventing modern slavery requires ongoing vigilance and continual improvement.

We monitor the effectiveness of our approach through:

- supplier due diligence across higher-risk suppliers
- procurement colleague completion of modern slavery awareness training
- colleague completion of mandatory modern slavery training
- safeguarding activity and appropriate referrals where exploitation is suspected
- review of any reported modern slavery concerns or incidents
- periodic review of relevant policies, procurement arrangements and this Statement.

During 2025/26, no modern slavery incidents or supplier concerns were identified. Mandatory modern slavery training continued to be delivered to colleagues as part of our core learning programme.

Looking ahead

During 2026/27 we will continue to:

- maintain effective due diligence across our supply chain
- review procurement arrangements and supplier expectations
- continue colleague awareness and mandatory learning
- work with partners to identify and respond to potential risks
- review this statement annually to ensure it remains effective and reflects current legislation and good practice.

Board approval

This Statement is made under section 54(1) of the Modern Slavery Act 2015. It was approved by Moat's Board on 30 July 2026 and applies to all companies within the Moat Group.

We will submit this statement in the UK Government's Modern Slavery Statement Registry in line with transparency best practices.



Gavin Cansfield
Chief Executive Officer

30 July 2026