



PERSIMMON

Together, we make a home



CHARLES CHURCH

Persimmon Group Modern Slavery Statement

This statement sets out the steps taken by the Persimmon Group during the year ended 31 December 2017 to prevent modern slavery and human trafficking in our business and supply chains. The statement covers the Persimmon Group including Persimmon Plc, Persimmon Homes Limited, Charles Church Developments Limited and Hillreed Homes Limited.

Introduction

Persimmon is one of the UK's leading housebuilders. We are opposed to and strictly prohibit modern slavery and human trafficking and take this matter very seriously. We treat all of our stakeholders, including our employees, workers, subcontractors, and suppliers fairly and with respect and we will not tolerate illegal practices in our own business or in our supply chain.

Our Organisation

The Persimmon Group has 3 main trading companies, which are all UK companies, Persimmon Plc, Persimmon Homes Limited and Space4 Limited. There are 30 regional housebuilding businesses within the group, which build homes across England, Wales and Scotland. Our Space4 operating business is based near Birmingham and operates the largest automated manufacturing plant for the production of timber frames and highly insulated wall panels and roof cassettes in the UK. In addition, we have recently commenced production of concrete bricks at our new brick manufacturing plant in Harworth, Nottinghamshire which will provide a substantial proportion of the Group's brick requirements.

The Group's Risk Committee oversees procedures to prevent modern slavery and ensure that risks are properly investigated across all Group companies and operations.

Policies

We treat all of our stakeholders, including employees, suppliers, subcontractors, business partners and customers in a fair and respectful manner and uphold all basic human rights. We have various policies in place setting out how we do this, including a Human Rights policy, Anti-Bribery policy, Code of Ethics and Supplier Principles, all of which are available on our website. All of these policies were reviewed and updated in 2017. In particular our Supplier Principles were strengthened to further highlight our commitment to reducing the risks of modern slavery and human rights abuses within our business and supply chain.

Our Procedures

Our Own Business

We do not employ any person below the age of 16 in any of our business operations, including on our sites. As a reputable UK business, we ensure that as a minimum we comply with all relevant employment legislation, including legislation upholding minimum pay levels, legally mandated benefits, working conditions and working hours.

We have procedures in place to ensure that each of our businesses confirms that all employees and labour only sub-contractors are eligible to work in the UK. We also have systems in place to ensure that our businesses adhere to our procedures and legislation. In addition to this, our Group Risk function conducts regular checks to ensure that these procedures are adhered to.



Our staff are encouraged to remain vigilant to unethical practices and we have whistleblowing procedures in place for the reporting of concerns.

Our Suppliers and Subcontractors

All of our suppliers and subcontractors are either UK entities or are UK offices of large international companies. We look to develop long term and mutually beneficial relationships with our suppliers, built on respect and honesty.

The majority of the goods we buy are produced either in the UK or in jurisdictions that have well established frameworks for stakeholder protections. A small proportion of the goods we purchase or components within goods we buy originate from geographies that do not have such well-established frameworks.

We do not condone the sale and use of materials that have been obtained or manufactured from an illegal or unauthorised source. Our suppliers must agree to our terms and conditions, which includes adherence to our Supplier Principles. Our Supplier Principles specify that all suppliers must comply with all relevant labour related legislation in the countries in which they operate, including those relating to working hours, employee wages and benefits, and that our suppliers must not engage in business practices that may be considered unethical or corrupt.

We have procedures in place to obtain confirmation from our suppliers, particularly those sourcing goods from countries deemed to be of higher risk that they continue to adhere to our Supplier Principles.

Steps Taken

During 2017 our Group Risk function reviewed the risk assessment (first carried out in 2016) of the processes and procedures in place within our own business and in our supply chain to prevent modern slavery and human trafficking. The review concluded that the assessment was still appropriate given the continued low level of the Group's overseas exposure and that our overall risk of non-compliance with the Act is low. However it was determined that further interrogation of our supply chain was appropriate in order to improve the understanding of the areas of higher risk and increase awareness of our expectations within our supply chain. A modern slavery due diligence survey was formulated in 2017 and issued to all of the Group's suppliers and subcontractors in January 2018. The responses will be analysed in 2018 with the results used to develop any necessary future actions and further due diligence.

Also during 2017, the Group Risk function introduced a programme of spot checks on records to demonstrate employee eligibility to work in the UK in order to strengthen our controls around right to work for both employees and labour only sub-contractors. Guidance was issued to Managing Directors and Construction Directors of the Group's operating businesses regarding employee eligibility, to ensure increased awareness in the operating businesses of expected controls in this area.

We also updated our whistleblowing procedures and re-issued information on our whistleblowing provision. Information on our whistleblowing procedures is available at all Group offices and sites.

We will continue to keep our practices and procedures under review.

Approved by the Board

Jeff Fairburn
Group Chief Executive
February 2018