

Persimmon Group Modern Slavery Transparency Statement 2025

Introduction

This statement sets out the steps taken by the Persimmon Group to prevent modern slavery and human trafficking within the Group's business and its supply chain and is published pursuant to the requirements of Section 54 of the UK Modern Slavery Act (2015). The statement covers all entities of the Persimmon Group, including Persimmon Plc, Persimmon Homes Limited, Charles Church Developments Limited, and Springfir Estates Limited.

The statement has been structured to align with good practice as outlined in Home Office guidance (Transparency in supply chains: a practical guide) and to clearly set out the measures in place within the Group, further steps taken within 2025, and its strategy for continuous improvement in 2026 and beyond.

Organisation structure and supply chain

Business model

Persimmon is one of the UK's leading housebuilders. Our business model involves identifying and investing in suitable land, and the design and build of good quality new homes at a range of price points across the UK. This is delivered through our three-brand strategy, including our core Persimmon brand, premium Charles Church brand and our Westbury Partnerships brand which focuses on affordable social and Build to Rent housing. The Group is strongly focused on operating as a responsible developer, with safe working practices a key priority, delivering high levels of customer service, and building sustainable communities.

Organisational structure

The Group operates through 29 regional housebuilding businesses that build homes across England, Scotland and Wales. These are supported by the Group's three manufacturing businesses; our Space4 business near Birmingham produces timber frame products, in addition to our Brickworks and Tileworks facilities at the Group's manufacturing hub in Harworth, near Doncaster. In August 2025, FibreNest, the Group's Internet Service Provider, was sold. On average across 2025, the Group directly employed 4,605 staff, with the remaining of our workforce being composed of sub-contracted labour (see below).

Supply chain

The Group's business model relies on a consistent supply of high-quality materials and a skilled sub-contractor base. Our housebuilding operations engage approximately 6,200 suppliers, the vast majority of which are UK-based. Via engagement with our supply chain, we have identified that certain materials and components are sourced from outside the UK. This analysis identifies that approximately 12% of suppliers, by volume, source a proportion of their parts from overseas markets, predominantly within the EU. Internal assessments also identify that a small proportion of materials, or their component parts, originate from higher-risk geographies where regulatory frameworks are less established, as referenced by the Global Slavery Index.

Group Procurement is responsible for the sourcing and negotiation of Group-wide contracts for construction materials, ensuring national supply chain coverage. The function works closely with suppliers to ensure that appropriate policies, controls, and due diligence processes are in place to prevent and identify modern slavery risks. For key commodities, suppliers are engaged



through formal framework agreements, which include our standard obligations relating to modern slavery compliance, including requirements to maintain equivalent policies or statements.

Compliance is monitored through structured supplier governance processes, including formal Quarterly Business Reviews with key suppliers. These reviews provide an opportunity to assess supplier controls, training, and adherence to both Persimmon's standards and equivalent supplier policies, ensuring continued alignment with our expectations on ethical practices and labour standards.

In addition to material suppliers, the Group engages a significant number of sub-contractors, all of which are UK-based. These range from individual tradespeople to large contractors operating across multiple regions. The Group continues to maintain appropriate oversight and contractual controls to ensure compliance with modern slavery requirements across this part of the supply chain.

Group commitments on modern slavery and human trafficking

The Group has adopted the definition of modern slavery and human trafficking as outlined within section 54 of the Modern Slavery Act (2015).

We are committed to the fair treatment and respect of all our stakeholders, including our employees, workers, sub-contractors, and suppliers. This includes adoption of good labour practices consistent with the eight fundamental conventions of the International Labour Office (ILO), as manifested by our continued status as a Living Wage Foundation accredited employer (see steps taken in 2025 below).

We are committed to taking the strongest possible measures to prevent the occurrence of modern slavery and human trafficking within both our immediate operations and our supply chain. This includes acting swiftly and decisively on any of the indicators of forced labour as set out by the ILO, such as abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions and excessive overtime. The Group has established supporting policies setting out how we do this, including our Supplier Principles, Human Rights Policy, Code of Ethics, and Anti-Bribery and Corruption Policy, all of which are available on our website.

Assessing the risk of modern slavery

The Group's Sustainability Committee monitors the risks of modern slavery and human trafficking and reviews these on an annual basis. The identification and assessment of risk is based on an assessment of the Group's comprehensive risk registers, which score identified risks on impact and likelihood ratings (including methodologies to ensure consistency in assessing different risk impacts, for example financial or reputational risks). This is complemented by analysis of external sources of data, including publications from Global Slavery Index and Unseen, materials obtained via the Gangmasters and Labour Abuse Authority (GLAA), and engagement with industry forums and other stakeholders on modern slavery.

In line with our previous assessments, two main risk areas have been identified from the Group's modern slavery risk assessment:



Risk of non-compliance by agencies or sub-contractors with labour-related legislation

Failures in our sub-contract labour force could result in modern slavery directly occurring on our sites or affecting our on-site operations. Within 2025, one such incident of potential labour abuse and modern slavery was identified in the Group's operations (with one in 2024, and none in 2023). This followed a visit to one of our sites by the Home Office's Immigration Enforcement team, with concerns over the immigration status of workers engaged by a sub-contractor used on the site. The Persimmon operating company where the visit took place cooperated fully with the investigation, and maintained regular contact with our Group Health, Safety & Environment and Group Internal Audit teams to ensure all relevant information was shared with the investigating authorities. Following the investigation, it was confirmed that no government enforcement action was taken against the sub-contractor.

Risk of modern slavery within material supply chain

A small minority of our construction materials, or components within certain items, may originate from nations with a higher exposure to modern slavery risks, as determined by Global Slavery Index. As an example, in 2023 we were notified of a risk of forced labour in the manufacture and supply of polysilicon in the Xinjiang region of China with action taken at the time to audit our supply chain. During 2024 we commenced a procurement process for PV, Inverters and Batteries, with prequalification, excluding manufacture or suppliers unable to demonstrate ethical and sustainable practices within their supply chain.

The Group is committed to maintaining effective controls to mitigate these risks and in being proactive in raising awareness of modern slavery issues among our employees, suppliers and sub-contractors. Our assessment is that, taking into account the effectiveness of the mitigating controls and due diligence measures of the Group (see below), the overall residual risk remains low.

Business and supply chain due diligence

Within the Group

The Group has established procedures to confirm all employees and labour-only sub-contractors are eligible to work in the UK. Our management systems and controls, supported by annual audits and data analysis from our Group Internal Audit department, help to ensure that our businesses adhere to our procedures and legislation. This includes those concerning working conditions, working hours, and obligations on rates of pay as a Living Wage Foundation accredited employer.

Our staff, suppliers and sub-contractors are required to remain vigilant to any unethical practices, including any concerns around modern slavery. We maintain a culture of openness where concerns can be reported freely, either through routine line management or through employee engagement mechanisms. Modern slavery training programmes are in place, and awareness posters have been issued to all sites and offices. A whistleblowing provision is maintained for the anonymous reporting of concerns, with details of how to report concerns displayed on posters in all sites and offices. All whistleblowing concerns are investigated by our Group Internal Audit department and reported to the Board via the Audit & Risk Committee, regardless of whether proven or not.

Suppliers and sub-contractors

The vast majority of the Group's tier-one suppliers and sub-contractors are either UK based entities or are UK subsidiaries of large international companies. The Group has built long-term



relationships with its suppliers, who also serve many industry peers and there is a collective interest in ensuring compliance with the modern slavery requirements.

Most of the goods we buy are produced either in the UK or in jurisdictions that have well established frameworks for stakeholder protection. As noted elsewhere within this statement, a small proportion of materials procured originate from outside such jurisdictions. Where these are identified, either through routine supplier due diligence or through periodic internal audits, assurances are sought from suppliers to ensure appropriate safeguards are in place on the ethical sourcing of the materials. This includes prequalification against agreed criteria, assessment of modern slavery statements and other publicly available documents, and discussions with the suppliers.

Our suppliers must agree to our terms and conditions, which includes adherence to our Supplier Principles. Our Supplier Principles require suppliers to 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. Modern slavery provisions and right to audit are also included in our Framework Agreements, and Quarterly Business Reviews are held with Framework Suppliers and Merchants where modern slavery is an agenda item.

The Group's sub-contractor terms and conditions also include provisions on modern slavery awareness, training and reporting protocols for any concerns identified or observed in the performance of their work. Additionally, as part of our commitments as a Living Wage Foundation accredited employer, we have undertaken to implement Real Living Wage obligations into our standard terms and conditions as agreements are renewed.

Training and workforce awareness

The Group continues to emphasise the importance of training to boost workforce awareness of modern slavery risks. A range of training courses are in place, tailored to different roles and the potential exposure to modern slavery risks.

To address workforce risk, we have developed detailed training for our Site Managers and specific mandatory training for our Commercial and Procurement teams to improve awareness of modern slavery risks within our supply chain. At the time of reporting 92% of staff required to undertake modern slavery training had completed the course within the past 24 months. This is an on-going process with the training module attached automatically to new members of staff as part of their Learner Management Programme, and existing staff automatically reassigned the training to refresh every two years.

Modern slavery is now a key mandatory section of our Site Managers' Essentials Induction Programme available to all site management staff as well as a stand-alone module remotely delivered training session for site teams.

On an annual basis, a mandatory Modern Slavery Awareness Campaign is released through our Persimmon Way site app, which reaches all workers signing in on site over a given period. This provides key updates on spotting the signs of modern slavery and how to report concerns. The most recent campaign, which concluded in early 2026, reached over 35,385 workers.

In addition, our mandatory training includes ethical behaviours covering Anti-bribery and

corruption and is compulsory for relevant managers and commercial teams and completion of mandatory training is monitored and reported at both regional and board level. Training is assigned automatically for new starters, and all candidates are automatically re-enrolled on expiry of the course.

Actions taken in 2025

Within the year ending 31 December 2025, the Group took a number of actions to enhance its control environment in respect of modern slavery prevention:

Real living wage

Persimmon retained its Living Wage Employer status in 2025 from the Living Wage Foundation. The Group had been paying its own directly employed staff the Real Living Wage since January 2019, but since obtaining our Living Wage Employer status we have extended this commitment to include our sub-contractor workers.

Industry initiatives

The Group has continued to actively monitor communications and alerts from the GLAA, ensuring key staff remain up to date with trends and intelligence relating to modern slavery, and adopt further areas of good practice where required. In 2025 the Group continued to engage with the CCLA led 'Find it, Fix it, Prevent it' initiative, with senior staff attending seminars and other events to benchmark processes and understand stakeholder concerns specific for our sector. Informed by these inputs, a comprehensive suite of controls has been established. This included regular audits on supply chain controls and awareness, led by our Group Internal Audit department.

Training and awareness

Training remains a key area of the Group's focus. Within 2025, the Group provided greater access to modern slavery training materials through an on-line Learning Management System. The training modules incorporate materials and videos from the Sustainability Supply Chain school. All sites had modern slavery, living wage and whistleblowing posters on site notice boards. Our health and safety induction film, delivered to all site workers, contains a section on modern slavery and how to spot the signs and report concerns.

Routine inspections and worker interviews were carried out by the Group HS&E department, and tailored training is in place for employees in Commercial, Procurement and Construction functions, in addition to the annual delivery of a GLAA developed 'Toolbox Talk' for all site-based workers, communicated to staff via the Persimmon Way app.

Reporting concerns

Within the year, enhancements were made to the Group's whistleblowing provision, as part of an updated 2025 benchmarking exercise performed with the support of Protect, the whistleblowing charity. These have included the appointment of a new Board level whistleblowing champion, improved recording of reported concerns and awareness campaigns (the 2025 employee engagement survey found over 87% of staff were fully aware of reporting processes).

Standardised programmes of inspection

To ensure site awareness of modern slavery risk, as part of their routine programme of site inspections, the Group Health, Safety & Environment team performed checks on all sites in

February 2026 to ensure modern slavery awareness and reporting signage was in place on development sites. We also sent a communication via the Persimmon Way App to all site workers, providing the modern slavery segment of the induction film followed by three validation questions (which they must pass) to ensure the person's understanding of modern slavery. In 2025 37,735 people completed inductions which included modern slavery training.

The Group Internal Audit department performs an annual audit on modern slavery controls, the scope of which varies, but typically includes training and policy awareness, supply chain controls (such as material supplier selection and on boarding, contractual provisions, and visits to manufacturing facilities) and follow-up on prior year audit actions. The 2025 review focused on right to work processes, agency labour controls and detailed desktop reviews of modern slavery controls in a selection of key suppliers. The review provided assurance that the Group's controls continued to be generally effective; however, some issues were identified including instances of delayed right to work checks, and some providers of agency labour being unaware of our Real Living Wage commitments. Action plans were established to address both issues.

Strategy and actions to be taken in 2026

The Group remains committed to finding, fixing and preventing modern slavery within its operations and its supply chain. In addition to maintaining measures introduced in 2025 (see above), the strategy for continuous improvement will include the following measures for 2026 and beyond:

Standardised programmes of inspection

The programme of site inspections by the Group Health, Safety & Environment team will continue for 2026 to ensure modern slavery awareness on development sites. As part of their routine programme of site inspections, the Group Health, Safety & Environment team will perform checks to ensure modern slavery awareness and reporting signage is in place on development sites, and spot check awareness with site operatives through The Persimmon Way App.

Routine operational and supply chain internal audits

The Group Internal Audit department will continue to include modern slavery controls within the scope of its 2026 audit plan. This will include routine testing on right to work checks and sub-contractor appointment processes within the programme of operating company audits throughout the year.

Training & Awareness

Established training and awareness programmes are in place for sites and key commercial teams through mandatory training and onsite talks. Materials are reviewed annually to ensure up to date content. Mandatory completion rates are reported bimonthly at board and regional levels.

Site modern slavery signage on all sites will be maintained and included in all induction materials. This ensures a high level of awareness on how to spot the signs of modern slavery and how to report concerns.

Updates and intelligence from the Fair Work Agency (which replaced the GLAA and other bodies in early 2026) and other sources of good practice will be routinely reviewed. This will include engagement with industry forums such as those led by the CCLA, with pertinent



information from such engagement communicated to operating businesses and commercial and procurement teams to ensure ongoing awareness.

Performance monitoring and assessment of effectiveness

Persimmon recognises that the effectiveness of our approach to preventing modern slavery cannot be demonstrated through policies and procedures alone. We therefore focus on monitoring how our controls operate in practice, identifying where risks may persist, and strengthening our response over time.

Effectiveness is reviewed through a combination of:

- Ongoing oversight of labour practices within our own operations
- Monitoring supplier compliance with our expectations
- Review of concerns raised through whistleblowing or reporting mechanisms
- Periodic internal review of policies, procedures and governance arrangements

Where areas for improvement are identified, these are used to inform updates to our approach, including enhancements to supplier engagement, training and contractual controls.

At this stage, Persimmon uses a combination of **qualitative and activity-based indicators** to monitor effectiveness, recognising that the development of more outcome-based metrics is an area of ongoing focus. The indicators we currently monitor include:

- Coverage of relevant employees completing training on modern slavery awareness
- Confirmation that right-to-work checks are undertaken in line with legal requirements
- Use of supplier onboarding and due diligence processes designed to identify and mitigate labour-related risks
- Operation and accessibility of our whistleblowing arrangements, including the ability to raise concerns confidentially
- Review of any labour-related concerns identified, and actions taken in response

We acknowledge that the small number of identified incidents or whistleblowing reports does not necessarily indicate an absence of risk. Our monitoring is therefore designed to support vigilance, transparency and learning, rather than simply to confirm compliance.

Where concerns relating to modern slavery or labour exploitation are identified, Persimmon's approach is to respond proportionately and responsibly. This may include escalation through appropriate internal governance channels, engagement with suppliers or contractors to address identified issues, and, where appropriate, remediation actions aimed at preventing recurrence.

Our approach is informed by the principle that responsible action should prioritise the welfare of affected individuals and avoid actions that could unintentionally cause further harm, such as immediate disengagement without mitigation.

Persimmon is committed to continuous improvement in its approach to tackling modern slavery. Over the coming reporting periods, we will continue to enhance our monitoring and effectiveness framework, including:



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- Further development of risk-based indicators linked to key areas of our supply chain
- Improving our ability to assess the effectiveness of supplier engagement and due diligence activities
- Strengthening the quality and consistency of management information to support oversight and decision-making
- Using internal reviews and external guidance to inform updates to our approach

These steps are intended to support more meaningful measurement of effectiveness over time and to ensure our modern slavery statement continues to reflect both the actions we are taking and the progress we are making.

Approved by the Board
9 June 2026