

Slavery and Human Trafficking Statement for the Year Ended 31 March 2025

1. Organisational Structure and Supply Chains

Cromwood is a group of companies which includes both Cromwood Limited and Cromwood Housing Limited.

Cromwood Limited is our mission-led housing management company, working with central and local government, and with landlords, to provide vital housing for people who are homeless or seeking asylum.

Cromwood Housing Limited is our Registered Provider (RP) of social housing, overseen by a separate board of directors and regulated by the Regulator of Social Housing.

Our activities take place solely in England and relates to the provision of affordable housing and related services for people in central and west London. In doing so, we participate in some partnering arrangements with suppliers and contractors.

Through this Statement we encourage our delivery partners, suppliers and others within our frameworks with whom we engage to read and apply, as appropriate, the requirements of The Modern Slavery Act (the Act) 2015 and to confirm to us their approach to compliance.

2. Supply Chain Policy

Our procurement activities take place in England and our contractors and suppliers are predominantly UK and EU based. Our major contractor partnering arrangements are for repairs and property maintenance activities

We expect our delivery partners, organisations within our frameworks and other suppliers we engage with to ensure their goods, materials and labour-related supply chains to:

- Fully comply with the Act
- Be transparent, accountable and auditable; and
- Be free from ethical ambiguities.

3. Our Employment Practices

Our policy is to pay all our employees at least the Living Wage and our recruitment processes are designed to ensure that all new employees have the right to work in the UK

We are in touch with all the employment agencies which we use to ensure that they have confirmed their compliance with the Act

Employees are encouraged to report evidence of non-compliance with the Act, including any concerns about our supply chains or any issues relating to the association's residents through our Whistleblowing policy.

4. Steps Taken

Our Safeguarding Policies are reviewed annually. No modern slavery related incidents or concerns relating to service delivery have been reported since the 2015 Act was enacted.

We require our contractors to provide a declaration that they are not involved in modern slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking.

5. Training

We provide mandatory training to relevant staff to raise awareness of the risks of modern slavery and human trafficking in the organisation's supply chain and other parts of the business. In addition, safeguarding training is also mandatory.

6. Due Diligence

We continue to take the appropriate steps to ensure that there is no modern slavery or human trafficking in our supply chains. This includes incorporating provisions within our tender processes that would-be suppliers have appropriate anti-slavery and human trafficking policies and procedures and have carried out due diligence to ensure that there is no slavery or human trafficking in their supply chains. This also includes seeking assurance from all current and future HR agencies that the legislation is being complied with.

The Executive are responsible for compliance within their respective departments and of the organisation as a whole.

This statement is made in accordance with Section 54 of the 2015 Act. It will be updated annually in line with the Modern Slavery's Act's reporting requirements.

Moses Hirschler, Chief Executive



Dated: 1/4/2024