

Sovereign Network Group**Modern Slavery Statement Financial year end 2024-25****Our Business and Organisational Structure**

Sovereign Network Group was formed in October 2023 through the merger of Sovereign Housing Association Limited and Network Homes Limited. It is a social business and one of the largest housing associations in the country. We have deep roots in the south of England, with over 84,000 homes focused in a core area covering London, Hertfordshire, Berkshire, Hampshire, Oxfordshire, Gloucestershire, Dorset, Devon, Wiltshire, the West of England and the Isle of Wight. Sovereign Network Group (SNG) is a Registered Provider of Social Housing registered as a society under the Cooperative and Community Benefit Societies Act 2014 with the Financial Conduct Authority (7448) and with the Regulator for Social Housing (4837).

This statement covers SNG and its subsidiary companies as listed below:

Sovereign Housing Design and Build Limited (Company Number: 06195779)

Sovereign Housing Developments Limited (Company Number: 07233624)

Sovereign Advances Limited (Company Number: 06927929)

Sovereign Housing Capital plc (Company Number: 06992513)

Sovereign Living Limited (FCA Registration Number: 26400R)

Sovereign Housing Partnerships Limited (Company Number: 07174978)

Spectrum Premier Homes Limited (Company Number: 2914932)

Network Homes Investments Limited (Company Number: 6105444)

Network Affordable Developments Limited (Company Number: 9038196)

Network Treasury Services Limited (Company Number: 6424065)

Network New Build Limited (Company Number: 4076854)

Network Homes Investments (Stockwell) Limited (Company Number: 6105693) (in liquidation)

For more information about Sovereign Network Group please go to our website

www.sng.org.uk

Procurement and Supply Chains

SNG has income of £794m, operating expenditure of £525m, cost of sales of £110m and sale of housing properties £52m across SNG and its subsidiary companies. The way we manage our procurement and supply chain is important to our financial viability, reputation and Environmental, Social and Governance (ESG) objectives. We recognise that good procurement and supplier relationship management practices can directly enhance our business performance by securing best value goods and services against favourable commercial and contractual terms.

Our supply chains include sourcing of goods, services and works for the development, delivery and maintenance of quality homes as well as corporate service requirements.

In line with Government guidance on the pre-qualification of suppliers in a tender process, our tender questionnaires are based on the periodically updated Standard Selection Questionnaire, aligned with Public Procurement Act 2023.

Part 1 and Part 2 of the Standard Selection Questionnaire list the exclusion grounds that apply to public procurements above thresholds, and the statutory guidance states that the selection questions in Part 3 should be adopted across all procurement procedures and embedded as needed into procurement processes. As such SNG has adopted the standard Selection Questionnaire structure as a starting point to develop proportionate questions in the tender documents for lower value procurements. This ensures standardisation of the supplier due diligence checks for company good standing.

Part 3 (Selection Questions) includes a section specifically on the Modern Slavery Act 2015 and a declaration to be completed by potential suppliers that they have measures in place to ensure that they are not involved in modern slavery or human trafficking.

Where appropriate, the Common Assessment Standard (CAS) is used in works contracts above the relevant regulatory thresholds, including a specific question to confirm bidders' commitments to ensuring that there is no modern slavery or human trafficking in SNG's supply chain.

In SNG, tender declarations are mirrored in our Supplier On-boarding process for new suppliers. This also addresses checks on low value suppliers that have been appointed in line with Financial Regulations.

From a contractual perspective, our terms include robust conditions in respect of Anti-Slavery, Labour Laws and onward contract management practises addressing the adherence to the standards required.

Policy Statement on Slavery and Human Trafficking

SNG is committed to Environmental, Social and Governance responsibility and has zero tolerance for slavery and human trafficking. We are committed to complying with our legal and regulatory obligations, including the Modern Slavery Act 2015. We hold ourselves and our supply chain accountable and we fully comply with the provisions of the Modern Slavery Act 2015.

Our supply chain is an extension of our business and our values. We hold both ourselves and our partners accountable to uphold the principles of our Equality, Diversity and Inclusion (EDI) Policy and to prevent modern slavery and human trafficking in all dealings with us, our residents, and our communities.

We recognise that slavery and human trafficking risks may be present across our supply chain and operations, including but not limited to:

- Construction sites
- Repairs and maintenance contractors
- Grounds maintenance and cleaning services
- Facilities management and security provision
- Temporary labour or recruitment agencies
- Imported materials, products and PPE within our construction and asset supply chains
- Waste management and recycling services

We also recognise the potential for modern slavery to impact our residents directly, including the risk that properties may be used to accommodate trafficked individuals or victims of exploitation. As a housing provider, we are committed to identifying and reporting such risks in line with safeguarding responsibilities and partnership working.

We have rigorous Human Resources procedures in place to ensure that all employees have a legal right to work in the UK, are paid a fair and legal wage, and are under no duress.

Our social purpose and commitment to preventing slavery and human trafficking are also reflected in our Safeguarding and Procurement Policies, to underscore the seriousness of slavery and human trafficking and ensure that staff are aware of and responsive to the issues. We have an open accountable culture and if slavery and safeguarding issues emerge, these are reported through standard management processes, the Safeguarding Reporting process or through our Whistleblowing process, we also have processes in place around anti money laundering and have a dedicated Anti Money Laundering officer, enabling staff to report instances that may be associated with slavery or human trafficking, linked to money laundering activities.

SNG and its subsidiaries will not support or deal with any business knowingly involved in slavery or human trafficking. The Board of Directors and all senior management take responsibility for implementing this policy statement and its objectives and provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

In terms of oversight, procurement and compliance are reviewed by the Audit and Risk Committee of the Board regularly. This statement is made pursuant to s.54(1)

of the Modern Slavery Act 2015 and constitutes our Group's modern slavery and human trafficking statement for the financial year 1st April 2024 to 31st March 2025, It has been approved by the Group Board. It will be reviewed by the Board annually and updated as necessary or on an annual basis

Training (L&D)

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our procurement and supply chains within our business, we continue to provide relative online training to relevant members of staff. All staff are required to complete the training, with records maintained and recorded when completed. It is the line managers responsibility to ensure training is completed on time. Training also includes testing of staff members' knowledge and each individual must attain an 80% pass mark to complete the course.

We also continue to provide relative training to our relative frontline staff to help them identify potential cases of slavery and human trafficking and how to report them.

Future Action

During this financial year SNG continues to mobilise key projects to expand further the steps it takes to combat modern slavery and human trafficking as follows:

We have a proactive Supplier Relationship Management (SRM) framework in place to support the business in managing supplier performance and strengthening collaborative ways of working. As part of this, we use a standardised supplier scorecard to measure performance against key KPIs, including compliance with our Modern Slavery requirements. This data is reviewed regularly and used to guide structured conversations with suppliers, helping to identify risks, support continuous improvement, and drive value for both our customers and our business. Alongside this, we carry out periodic checks to ensure suppliers keep their Modern Slavery declarations up to date and engage with them to understand any emerging pressures or risks within their wider supply chains. Our SRM tools and reporting functionality enable us to monitor and report on KPI performance at both operational and commercial levels, ensuring accountability and transparency across our supply chain.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year ending 31st March 2025.

Date of Board Approval: 10 July 2025