

Modern Slavery and Human Trafficking Statement 2025/26

Financial year 1 April 2025 to 31 March 2026

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and outlines Bromford Flagship LiveWest's approach to recognising and addressing the risks of modern slavery and human trafficking within its operations and supply chains. It reflects the position for the financial year ending 31 March 2026 and our continuing commitment to ethical standards, transparency, and the protection of human rights.

Our organisation

Bromford Flagship LiveWest provides affordable housing and related services across a wide geography in England. The Group's activities include housing management, repairs and maintenance, development and construction, customer support, and a broad range of corporate and professional services.

As of 31 March 2026, the Group managed 127,211 homes, employed 5,551 colleagues, and had annual turnover of £945.6m.

For the purposes of this statement, Bromford Flagship LiveWest comprises the Group and its relevant subsidiaries. This statement applies across the Group where relevant to the activities and entities within its statutory scope.

Any references to Bromford Flagship LiveWest in this statement should be interpreted accordingly.

Our commitment

We are committed to maintaining high standards of integrity, transparency, and ethical conduct. We recognise our responsibility to respect human rights and to take reasonable and proportionate steps to prevent modern slavery and human trafficking within our own operations and throughout our supply chains.

We seek to work with suppliers, contractors, and partners whose practices reflect our ethical standards. Our approach is focused on prevention, appropriate due diligence, awareness, and effective routes for concerns to be identified and escalated.

- Upholding human rights in our own operations and supply chains.
- Ensuring colleagues, agency workers, suppliers, and contractors understand their responsibilities.
- Applying appropriate controls through recruitment, procurement, supplier onboarding, and contract management.
- Continuously reviewing and strengthening our arrangements in response to organisational change and emerging risks.

Governance and responsibilities

The Group Board is responsible for approving this annual statement before publication. Modern slavery and human trafficking risks are managed through the Group's relevant governance, policies, procedures, and operational controls.

Policies and procedures

Policies and procedures across the Group support our commitment to ethical conduct and provide mechanisms to prevent, identify, report, and respond to exploitation. Relevant arrangements include safeguarding, anti-fraud, bribery and corruption, whistleblowing, recruitment and people management, health and safety, procurement and supplier and contract management controls.

Work to align relevant arrangements across Bromford Flagship LiveWest is continuing as part of the wider Group integration programme.

Our colleagues and recruitment

Recruitment and people management controls are designed to ensure prospective colleagues are legally entitled to work in the UK and to protect colleagues from abuse or coercion.

Whistleblowing and grievance arrangements provide routes for colleagues to raise concerns, including concerns relating to potential modern slavery or human trafficking.

Procurement and supply chains

Our supply chains include construction and development works, repairs and maintenance contractors and materials, information technology and software, and a wide range of professional and corporate services. We recognise that modern slavery risk is not uniform across these categories and that particular sectors, labour models, products, and geographies may present a higher risk of exploitation.

Procurement and supplier management provide important controls for identifying and managing these risks. Where appropriate and proportionate to the nature and risk of the requirement, our activities may include:

- Considering modern slavery and ethical supply-chain risks during procurement planning and market engagement.
- Assessing suppliers through relevant tendering, selection, and onboarding processes, where appropriate.
- Using relevant exclusion and selection requirements within applicable procurement legislation and procurement documents.
- Including relevant contractual requirements and expectations within contracts and supplier relationships, where appropriate.
- Using contract management and supplier engagement to monitor performance and raise issues where necessary.
- Reviewing vendor management and approval processes as Group systems and procedures are aligned.
- Supplier onboarding and due-diligence arrangements are in place including supplier checks and system flags to identify when checks require renewal or review.

Assessing and managing risk

We aim to identify, assess, and manage modern slavery and human trafficking risks across our operations and supply chains in a manner proportionate to the nature and level of risk. This includes monitoring potential areas of vulnerability, engaging with suppliers and contractors, applying due diligence through procurement and recruitment processes, using safeguarding arrangements where exploitation may affect customers or others, and reviewing controls as risks and organisational arrangements evolve.

We continue to strengthen our understanding of modern slavery risks and our ability to identify and respond appropriately to potential exploitation.

Safeguarding

Safeguarding arrangements provide a route to identify, investigate and report suspected neglect, abuse and exploitation, including modern slavery and human trafficking. Colleagues who interact with customers may be well placed to identify indicators of exploitation or other welfare concerns and are expected to follow the relevant safeguarding procedures when concerns arise.

Training and awareness

We recognise that effective controls depend on colleagues understanding the signs and risks of modern slavery and knowing how to respond. Relevant safeguarding and modern slavery awareness training and resources are provided across the Group.

Reported concerns

For the financial year 1 April 2025 to 31 March 2026, no cases of modern slavery or human trafficking were identified within the Group's operations or supply chains.

We recognise that an absence of reported or confirmed cases does not, in itself, demonstrate that operations and supply chains are free from exploitation. We therefore continue to focus on awareness, due diligence, and effective reporting routes.

Progress and measuring effectiveness.

Work is underway to strengthen the organisation's approach, including development of a unified modern slavery approach since the merger on 29 January 2026. Progress during 2025/26 is summarised below.

	Position during 2025/26	Next steps
	A Group Modern Slavery Policy has been developed	Complete the review, governance and approval process for the Group Modern Slavery Policy and embed the agreed Group approach following approval.
	Monitor training uptake and increase awareness	Continue contract management training programme during 2026/27, with the approach to be aligned Group-wide by April 2027.

Priorities for 2026/27

As Bromford Flagship LiveWest continues to integrate, our focus will be on establishing a consistent and proportionate Group approach to modern slavery risk, strengthening supply-chain due diligence and assurance, improving visibility of relevant training and controls, and ensuring responsibilities and reporting routes are clear.

Approval

This statement has been approved by the Bromford Flagship LiveWest Group Board on Monday 21 September 2026 and will be reviewed annually.



Signed:

Name: Sarah Beal Title: Group Company Secretary

Date: Monday 21 September 2026