



Sage Homes

Slavery and Human Trafficking Statement 2024

## 1 Introduction

- 1.1 Sage Homes has a zero-tolerance approach to slavery, servitude, forced or compulsory labour and human trafficking (modern slavery, a crime, and a violation of fundamental human rights). We are committed to ensuring that no practices of modern slavery take place within Sage Homes, whether directly or within its supply chain. Its staff are made aware through training that modern slavery and human trafficking can and do exist in present day society and encouraged to report their suspicions.
- 1.2 This Statement summarizes the steps Sage Homes has taken over the past year to prevent modern slavery in its business and supply chains and is made in accordance with section 54 of the Modern Slavery Act 2015.
- 1.3 This statement applies to all members of the Sage Homes Group, including Sage Housing Limited, Sage Rented Limited, Sage Homes RP Limited, and Sage Housing Group Limited

## 2 Business

- 2.1 The mission of Sage Homes is to bring new finance and a new approach to the provision at scale of good quality, well managed customer-focused affordable housing. Its vision is to be the premier registered provider in terms of the volume of new affordable homes and our reputation for delivery, customer service and relationships with the public sector and to be the housebuilders' affordable housing partner of choice.
- 2.2 As at the end of April 2024, Sage Homes had 357 people on its workforce, had taken delivery of 16,201 homes of which around 60% are rented and 40% shared ownership. Its strategic plan is to reach 30,000 units by 2026. Sage Homes operates entirely within England.

## 3 Policies

- 3.1 Sage Homes began providing social housing in 2017. It is and has always been committed to ensuring that social responsibility is an intrinsic element of its decisions, activities, and culture. Ensuring modern slavery and human trafficking form no part of its business is core to its values of creating homes for everyone and powering positive impact; creating safe homes in which people can flourish.
- 3.2 Accordingly, Sage Homes has the following policies in place which are relevant to and reflect its commitment to ensuring that no modern slavery or human trafficking exist in its supply chains or in any part of its business:
  - 3.1.1 **the Sage Homes codes of conduct and ethics which** set out the staff commitment to fair, honest, and lawful conduct. All members of the Sage Homes workforce – including officers, employees and consultants – are obliged to comply with these codes.
  - 3.1.2 **the Procurement Policy** which aims to ensure the consistent application of the Sage Homes ethics and values throughout its supply chain.
  - 3.1.3 **the Whistleblowing Policy**, which sets out ways to report anonymously any practices that members of the workforce consider to be in breach of Sage Homes Code of Ethics. Sage Homes has a zero tolerance for retaliation against anyone who speaks up in good faith.

## 4 Actions

4.1 Sage Homes recognizes that it needs to recognize, evaluate, address and minimize the risk of modern slavery and/or human trafficking:

4.1.1 **within its own internal operations;** and

4.1.2 **within its supply chains:** Sage Homes works with developers and other partners in the construction industry to develop and build new properties and with a range of contractors and other suppliers to provide housing management and customer services.

Sage Homes does not have any modern slavery within its internal operations, and it considers the risks of occurrence to be low, given its robust, internal policies and controls. However, it is not complacent and works with both its staff and its suppliers to reduce any risks even further.

4.2 **Recruitment:** The HR team within Sage Homes ensures that it complies with legislation in recruitment and consultancy hires and uses reputable agencies to source temporary staff.

4.3 **Training:** Sage Homes provides mandatory firmwide training to its staff (including new joiners and fixed term contractors) on modern slavery. It has also provided tailored safeguarding training for its customer-facing staff, enabling them to recognize suspicious circumstances and encouraging them to report any matters of concern appropriately.

4.4 **Partner Choice:** Sage Homes chooses its partners in the building industry carefully, working closely with large and reputable companies to mitigate the risk of facilitating slavery or trafficking.

4.5 **Procurement (Due Diligence and Conditions).** The procurement and contracting team carries out proper due diligence on all contractors and suppliers and makes them aware of Sage Homes codes and policies (including but not limited to the elimination of slavery and human trafficking) and their obligations to abide by these codes. New contractors are required to sign up to the Sage Homes Supplier Code of Conduct and it is made clear to them that violations of the code may lead to termination of our contracts with them.

## 5 Next Steps

5.1 Sage Homes will continue to:

5.1.1 remain vigilant;

5.1.2 review training practices and all relevant policies and procedures with a view to continual improvement;

5.1.3 review its tender processes and its contracts with existing suppliers, with the aim of strengthening its due diligence processes and obligation on suppliers; and

5.1.4 embed procurement and contracting processes throughout the organization, to ensure that all suppliers are being scrutinized correctly and have provided it with assurance on modern slavery and human trafficking before they are signed up.

This statement has been approved by the Boards of the above-mentioned Sage companies.

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Alison Thain OBE  
Chair