



Modern Slavery Statement 2025-2026

Introduction

VIVID Housing Limited, our Group parent, is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014; we are also a registered provider of social housing with the Regulator of Social Housing.

This Statement applies to the Group, apart from Bargate Homes Limited, who maintain their own statement, which is available on their website.

This statement was approved by the VIVID Board on 18 September 2025. Our financial year end date is 31st March.

Our business and supply chains

We're a leading provider of affordable homes and extensive support services in the south of England, with around 74,000 customers, 37,000 homes and 1,000 employees. We believe that everyone has the right to a safe and secure place to call home, and from the moment customers move into their VIVID home we're here to help with that and more.

We invest in our homes and communities for the long-term, and this means in the quality, safety and energy efficiency of existing homes and neighbourhoods, with a firm focus on improving services so they're easy to use and access by our customers.

We're addressing the shortage of affordable housing in the south, building the right type of homes to meet the needs of our local communities. We're the sixth largest developer of new homes amongst housing associations in England, having built over 1,500 last year.

This is summed up in our vision "More homes, bright futures".

Our homes and customers are spread across Hampshire, Surrey, Berkshire and West Sussex, encompassing over 20 local authority areas.

Our group structure comprises:

- Aspect Building Communities Limited (joint venture) is a joint venture in which VIVID has a 26% share. Development is undertaken through a Limited Liability Partnership (LLP) which owns the assets.
- Bargate Homes Limited (subsidiary) builds homes for outright sale and whilst owned by VIVID operates independently.
- Vestal Developments Limited (subsidiary) builds homes for outright sale.
- VIVID Build Limited (subsidiary) provides development services to VIVID Housing Limited.
- VIVID Housing Limited (parent)

- VIVID Plus Limited (subsidiary) is used for activities that support and deliver VIVID's Community Investment Strategy. Its charitable purpose is to create and support long term sustainable communities by improving the prospects and opportunities of customers living in those communities.
- Peninsular Capital plc (subsidiary) is our company which has been set up to transact our Euro medium-term note programme (EMTN).
- Our supply chain includes material and service suppliers for property maintenance, house building and supporting services.

Definitions

Modern slavery is defined as “the recruitment, movement, harbouring or receiving of humans using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation”. (www.gov.uk)

Human trafficking is the trade of humans for the purpose of forced labour, sexual slavery, or commercial sexual exploitation.

How we may encounter modern slavery and human trafficking

The majority of cases of modern slavery and human trafficking will involve some form of housing issue. The accommodation we provide could be a potential venue for modern slavery or human trafficking.

Construction is one of the sectors most associated with being at risk to Modern Slavery and exploitation in the building industry in the UK is on the rise. Procurement and supply chains linked to construction and property maintenance are the areas of our business most likely to encounter modern slavery or human trafficking.

Modern slavery or human trafficking could also be encountered in our work to support vulnerable customers, particularly those from minority or socially excluded groups, who may be subject to forced labour and/or domestic servitude.

We recognise the detrimental effect modern slavery has on society and we're committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place in any part of our business or anywhere in our supply chains in accordance with the Modern Slavery Act 2015.

Suspicious activity can be reported through our Speak Up policy/ procedure, which is published internally and on our website. This is reviewed and rolled out to our staff annually. Any concerns about activities occurring in our properties can also be raised, by our customers and the public, via our contact channels or directly with a member of staff.

What we do

Policies

- We have a robust framework of policies, procedures and contractual arrangements in place which contributes towards the prevention of slavery or human trafficking within our organisation and our supply chains.

- These include, but are not limited to, areas such as housing management, risk management, safeguarding, health and safety, recruitment, Speak up (whistleblowing), procurement, terms and conditions of employment, and codes of conduct for staff, suppliers and contractors, as well as due diligence and checks when recruiting staff or engaging suppliers or contractors.
- We encourage reporting of concerns related to our own activities or our supply chain through our Speak Up policy

Staff and Workforce

- We employ over 1,000 members of staff and are committed to treating those who work for us fairly;
- We're an accredited Real Living Wage employer and we are committed to meeting, and where we can, exceeding minimum wage requirements;
- We make all relevant pre-employment checks. We have an in-house recruitment model. Agencies are only used by exception, and we have a preferred supplier list of reputable employment agencies.
- We expect all employees to adhere to our Code of Conduct. Staff are required to declare any conflicts of interest annually.

Procurement and Supply Chain

- Our procurement activities take place in England and our contractors and suppliers are predominantly UK-based. We follow The Public Contracts Regulations 2015, which govern good practice in procurement;
- We collect and record assurance from our suppliers that they comply with the Modern Slavery Act 2015 or are exempt, reserving the right to terminate their status as an active supplier if they fail to do so;
- We collect Modern Slavery Statements from contractors through TrackMyRisks;
- Where we have a direct relationship with an investor or bank counterparty, we ensure they have a modern slavery statement publicly available.

Safeguarding

- We have safeguarding policies which address modern slavery. These are reviewed every three years, or sooner if legislation requires.
- We attend and contribute to the Housing sub-group of the Hampshire Safeguarding Board, sharing best practice and knowledge around particular issues, including Modern Slavery.

Our Commitment to Tackling Modern Slavery

- We publish our annual statement prominently on our website evidencing the actions that have been taken to reduce the risk of slavery and human trafficking from our business and supply chain;
- We publish our annual statement on our internal intranet for staff;
- We publish our annual statement on the Government Modern Slavery Statement Register;

- We have Modern Slavery training available on our Learning Hub for all staff and published knowledge articles to facilitate understanding of the implications of the Modern Slavery Act and what they should do to recognise and report potential incidences;
- Our Executive team have primary responsibility for implementing this statement, monitoring its use and effectiveness, and ensuring our internal control systems and procedures are effective in countering modern slavery and human trafficking.

What we plan for 2025/2026

The planned actions for 2025/26 will continue to focus on our high-risk areas in operations and procurement, with a focus on safeguarding and raising awareness. We will:

- Raise awareness of our statement and commitment to preventing Modern Slavery occurring in any part of our business or anywhere in our supply chains
- Encourage the completion of Modern Slavery training for all staff
- Review our Speak Up Policy and procedures and ensure staff are aware of how to report any suspicions and will be publishing a knowledge article
- Review and revise our Code of Conduct for suppliers and contractors
- Include articles on Modern Slavery and human trafficking in our customer newsletters to raise awareness with reminders on how they can report any suspicions
- Undertake a Safeguarding Review and implement at 2025 Safeguarding Action Plan, including the recruitment of a Safeguarding officer

Owner	Approved by	Date approved	Review date
David Ball	Board	September 2025	September 2026