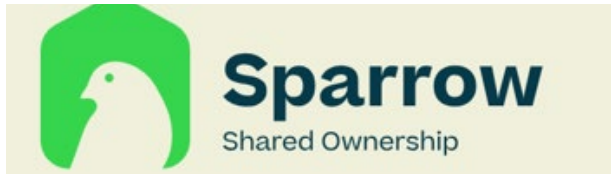




Sparrow Shared Ownership Homes

Slavery and Human Trafficking Statement 2024



1 Introduction

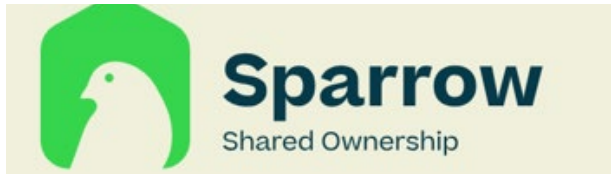
- 1.1 Sparrow has a zero-tolerance approach to slavery, servitude, forced or compulsory labour and human trafficking (modern slavery, a crime, and a violation of fundamental human rights). We are committed to ensuring that no practices of modern slavery take place within Sparrow, whether directly or within its supply chain. Sparrow's 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 Sparrow will take to prevent modern slavery in its business and supply chains and is made in accordance with section 54 of the Modern Slavery Act 2015.

2 Business

- 2.1 Sparrow's mission is to provide quality homes and excellent customer service to our customers. We do this by offering stability and flexibility and playing our part in supporting customers with their life choices. We will provide the customer with a great home that acts as a foundation for living and helps to get the customer to where they want to in life.
- 2.2 As at the end of March 2025, Sparrow will have 22 people on its workforce, and will own and manage 3,108 homes, all of which are shared ownership.

3 Policies

- 3.1 Sparrow began life as part of the Sage Homes Group, which began providing social housing in 2017. Sparrow is no longer part of the Sage Homes Group, but it has always been and remains 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, Sparrow will continue with the following policies 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 Sparrow codes of conduct and ethics which** set out the staff commitment to fair, honest, and lawful conduct. All members of the Sparrow 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 Sparrow 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 Sparrow Code of Ethics. Sparrow has a zero tolerance for retaliation against anyone who speaks up in good faith.



4 Actions

4.1 Sparrow acknowledges that it needs to recognise, 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**

Sparrow 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 Sparrow ensures that it complies with legislation in recruitment and consultancy hires and uses reputable agencies to source temporary staff.

4.3 **Training:** Sparrow 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:** Sparrow 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).** Appropriate due diligence on all contractors and suppliers is carried out and they are made aware of Sparrow 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 Sparrow 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 Sparrow 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 organisation, 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.

5.1.5 Identify material risks and where outside of tolerance develop remediation plans to address modern day slavery issues.

5.2 Over the next year, as Sparrow continues to operate under new ownership, its Board and executive team will develop a plan for to strengthen its measures against modern slavery.



This statement has been approved by Sparrow's Board.

Signed by:
David Avery
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David Avery
Chair

12/17/2024