



Anti-slavery and human trafficking transparency statement 2025/26

Introduction

This statement sets out the steps taken by Livin Housing Limited during the financial year ended 31 March 2026 to help ensure that slavery and human trafficking are not taking place within our business or supply chains. We are committed to acting ethically and with integrity in all our business relationships and to implementing effective controls to ensure such exploitation is not taking place.

Our structure, business, and supply chains

Livin Housing Limited is registered with the Regulator of Social Housing and is the parent company of Livin Developments Limited. This Statement covers Livin Housing Limited and all subsidiaries.

We are a local housing provider currently managing over 9,000 homes in the County Durham area of the United Kingdom. We aim to improve lives through sustainable homes and communities. As a charitable, highly regulated organisation, we conduct our business in a responsible and ethical way.

Our turnover in 2025/26 was £49.4m. Our supply chains include goods, works and services for the construction and repair of residential properties, property-related services, building materials, subcontracting and labour supply arrangements, and standard business goods and services such as IT equipment. We recognise that modern slavery can occur within both UK and international supply chains and that risks may arise beyond our direct suppliers, including through subcontracting, labour supply arrangements and the manufacture or sourcing of goods and materials. Our principal areas of inherent exposure include construction, property-related services, building materials, subcontracting and labour supply arrangements.

As a provider of social housing, we also recognise that modern slavery is not solely a supply-chain issue. Our employees and contractors may encounter indicators of exploitation through their work in customers' homes and communities.

Our policies and procedures in relation to slavery and human trafficking

We have in place a framework of policies, procedures and controls that support the prevention, identification and escalation of slavery and human trafficking risks within our day-to-day operations, our communities and our supply chains. These include:

- Recruitment and selection processes
- Employee Code of Conduct
- Equality, Diversity, and Inclusion Policy
- Customer Vulnerability Policy
- Safeguarding Policy
- Probity Policy
- Procurement Policy
- Contract and Procurement Rules
- Risk Management Policy and Strategy
- Anti-Fraud, Bribery and Corruption Policy
- Anti-Money Laundering Policy
- Fraud Response Plan
- Allocations and Lettings Policy
- Tenancy Visits Procedure
- Health and Safety policies and procedures
- Whistleblowing Procedure

Our due diligence and risk assessment processes for slavery and human trafficking

To minimise the risk of recruiting employees who may have been subject to human trafficking, every successful applicant must, prior to starting work, confirm proof of eligibility to work in the UK, successfully complete all necessary background checks and provide two acceptable references, including current or most recent employer.

Potential risks of trafficking, slavery, servitude or forced or compulsory labour within our communities or properties would be assessed and where appropriate escalated to relevant agencies through our Safeguarding Policy and associated procedures as employees conduct day-to-day business, which include planned periodic visits to every property and ad hoc visits as required.

Our approach to building and managing our supply chains is set out in detail in our Procurement Policy. To minimise the risk of modern slavery or human trafficking in our supply chains, we:

- require potential suppliers to declare that they are not involved in modern slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking – with a mandatory exclusion for those that have been convicted of child labour or human trafficking anywhere in the world during the past five years (including any person in a position of control within the company);
- include provisions in our standard contract documentation requiring our suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains; and
- regularly review our procurement policies regarding tenders and contracts to ensure they reflect best practice and mitigate against the risk of modern slavery.

We use external advisers to support us with major procurement processes in both our building and repairs and maintenance services, and to monitor contract performance on an ongoing basis.

Our effectiveness in combating slavery and human trafficking

We work closely with a small number of key suppliers, and therefore our approach to combating modern slavery in our supply chain following procurement is through contract monitoring and maintaining strong working relationships with our suppliers. Our largest suppliers, including Mears Group PLC, are themselves required to take steps to ensure compliance with the Modern Slavery Act 2015 and publish annual transparency statements.

We encourage reporting of any concerns of illegality through our line management structures or through our Whistleblowing Procedure, which allows anonymous reporting.

During 2025/26, no new concerns specifically identified as potential modern slavery or human trafficking were recorded. Cases of cuckooing, while not necessarily modern slavery, can involve the coercion and exploitation of vulnerable tenants. We continue to work with the police and other partners to safeguard and support affected tenants and take appropriate action against perpetrators where practicable.

We did not operate a separate set of modern-slavery-specific performance indicators during 2025/26. Given the nature and scale of our procurement activity, we consider our existing safeguarding, recruitment, procurement, contractual, contract-management and whistleblowing arrangements to provide the appropriate sources of assurance. We will keep under review whether proportionate additional measures are required in areas of greater inherent risk.

Training

We utilise external support on large-scale tenders to ensure that all risks, including the risk of modern slavery, are identified, and appropriately mitigated. Our relevant employees are regularly trained in

safeguarding, including case review and third party notification requirements, with revised frontline employee training delivered in 2025/26. We will keep the need for additional awareness or role-specific training in respect of modern slavery and human trafficking under review, particularly for employees involved in procurement, contract management, safeguarding and customer-facing services.

Looking ahead

During 2026/27, we will keep our approach under review, taking account of the nature and scale of our activities, identified risks, developments in legislation and government guidance, and relevant practice within the social housing sector. We will focus on proportionate improvements to the identification and recording of modern slavery risk within relevant procurement and contract-management arrangements and maintaining awareness among employees involved in procurement, contract management, safeguarding and customer-facing services.

Declaration

This statement has been approved by the Group Board and is made pursuant to section 54(1) of the Modern Slavery Act 2015, constituting the Group's modern slavery and human trafficking statement for the financial year ending 31 March 2026.

Natalie Wilkinson

Chair of Board

17 September 2026

Alan Boddy

Chief Executive

17 September 2026