

Modern Slavery and Human Trafficking Statement

Financial Year April 2024 – March 2025 (ending 31 March 2025)

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and outlines Bromford Flagship's approach to recognising and addressing the risks of modern slavery and human trafficking within its operations and supply chains. It reflects the financial year ending March 2025 and our commitment to uphold ethical standards and promote transparency across the organisation and its partnerships.

Bromford Flagship is committed to understanding the potential risks of modern slavery and human trafficking and to implementing measures that prevent such practices. This includes reviewing internal policies, engaging with suppliers, and working to ensure effective systems and controls are in place throughout the business and its supply chain.

Governance and Responsibilities

The Group Board approves this statement before publication. It is published on our website and Group Intranet.

Responsibilities for assessing and managing risks relating to modern slavery and human trafficking are delegated across the business.

Organisational Structure

Bromford Flagship Ltd is incorporated as a Community Benefit Society with the Financial Conduct Authority (register number 29996R). Bromford Flagship Ltd is a housing and community services provider operating across a wide geography and has a number of subsidiaries. We are the parent company of Bromford Housing Association Ltd, Flagship Housing Ltd, Merlin Housing Society Ltd, Bromford Home Ownership Ltd, Bromford Developments Ltd and Bromford Housing Group Investments Ltd. This statement applies to all entities in Bromford Flagship Ltd. As a social housing provider, Bromford Flagship delivers good quality, affordable homes to people whose needs are not met on the open market. We also offer additional support services to our residents.

Bromford Flagship manages over 80,000 homes across the East, Central and South-West of England delivering a broad range of services including housing management, repairs, maintenance, support, and development. As at 31 March 2025 the Group employed 3699 colleagues and had an annual turnover of £607 million. We collaborate with a diverse network of contractors, suppliers, and partners and recognise the responsibility to lead by example in addressing modern slavery and protecting the rights of everyone connected to our operations.

Our commitment

We are committed to maintaining the highest standards of integrity, transparency, and openness with our customers. We work to safeguard our assets and reputation and to ensure the proper protection of funds. Bromford Flagship seeks to only work with third parties who reflect our ethical stance and practices and consciously avoids alliances with any entity whose methods or policies do not align with our standards.

We are committed to making all reasonable efforts to ensure there is no modern slavery and human trafficking in our supply chains or any part of our business. We are committed to:

- Upholding human rights in our own operations and supply chains.
- Ensuring that colleagues, agency staff, and suppliers are aware of their responsibilities.
- Continuously strengthening our controls and awareness to prevent exploitation.

Policies and Procedures

Bromford Flagship's policies reflect a strong commitment to ethical conduct and integrity in all business relationships. We are focused on implementing and maintaining robust systems and controls to ensure that slavery and human trafficking do not take place within our operations or supply chains.

Policies are in place within the Group to support this commitment and are regularly reviewed to ensure they remain effective, relevant and aligned with evolving risks and legal requirements. They include:

Policy	Bromford Flagship Policy	Legacy Bromford Policy	Legacy Flagship Policy
Anti-Slavery and Human Trafficking Policy		<i>Safeguarding Procedure</i>	✓
Anti-Fraud, Bribery and Corruption Policies		✓	✓
Health and Safety Policies	✓		
Procurement Policies		✓	✓
Recruitment Policy		✓	<i>Recruitment Procedures</i>
Safeguarding Policies		✓	✓
Whistleblowing Policies		✓	✓

Work is underway to align and enhance policies across the Group following the merger which completed 28 February 2025, drawing on best practices from both legacy organisations.

Assessing and managing risks

Bromford Flagship is committed to proactively identifying, assessing, and managing risks related to modern slavery and human trafficking across our operations and supply chains. The majority of our supply chain consists of suppliers of repairs and maintenance components, construction works, information technology and software, repair and maintenance contractors and suppliers of professional services.

We recognise that certain business areas, sectors and geographies may present higher risks and we tailor our approach accordingly. Our risk management activities include:

- Monitoring potential risks to identify vulnerable areas and mitigate risk where possible within our supply chain and operations.
- Engaging with suppliers to understand their practices and ensure compliance with ethical standards.
- Implementing due diligence procedures during procurement and recruitment processes.
- Monitoring and reviewing controls to ensure they remain effective and responsive to emerging risks.

We continuously work to strengthen our understanding of modern slavery risks and enhance our internal capabilities to detect and respond to potential exploitation.

Reported concerns

In this past financial year (1 April 2024 to 31 March 2025), no such concerns were identified within Bromford Flagship's supply chains. However, we recognise that this does not guarantee our supply chains are entirely free from exploitation, and we are committed to increasing awareness and upskilling colleagues to risk assess and check for any potential signs of exploitation.

Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide safeguarding and modern slavery awareness training to colleagues.

Measuring effectiveness / next steps

Following the merger, Bromford Flagship has identified several key priorities to strengthen its approach to preventing modern slavery:

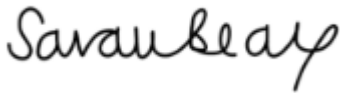
- Developing a unified Modern Slavery Policy and exploring the expansion of the Supplier Code of Conduct to ensure consistency and clarity across the organisation.

- Monitoring training uptake and continuing to increase awareness and knowledge of modern slavery and human trafficking with colleagues and third parties to promote understanding and vigilance.
- Collaborating with sector partners and national initiatives to enhance our approach and share best practices.

Approval

This statement has been approved by the **Bromford Flagship Group Board** on 29 September 2025 and will be reviewed annually.

Signed



Sarah Beal
Group Company Secretary
29 September 2025