

## Coastline Group Modern Slavery Commitment

### What is it Modern Slavery?

Modern slavery is a crime. It is a violation of fundamental human rights and takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. All of these things have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

It is understandable to think this sort of behaviour particularly in the UK would be obvious to spot, occur infrequently and be easily avoidable when working in professional environments. However, modern slavery is alarmingly commonplace, masquerading behind less obvious or less 'serious' appearing activities such as cash in hand payments, avoidance of NI contributions, failing to provide adequate respite during the day or week, or access to basic holiday and other statutory entitlements when undertaking live-in work such as Nannies or Carers.

All of these things amount to modern slavery, depriving a person of fundamental human and employment rights. This is not legal, ethical or acceptable.

### Coastline's Stance

That's why at Coastline we make a firm commitment to act ethically, taking a zero-tolerance approach to modern slavery in all of our business activities. People are our priority and we do everything we can to prevent modern slavery throughout our business activities.

We employ all our colleagues on at least a Living Wage Employer paying the 'real' living wage, complemented with generous benefits, enhanced holiday and other leave entitlements, and the opportunity to earn bonuses and other financial and non-financial incentives to everyone.

We match pension contributions in excess of the statutory minimum and work with our colleagues to provide additional financial, physical and mental health and wellbeing services as part of our culture.

Our commitment to these ethical ways of working extends not only to internal people practices, but across all our business relationships with suppliers, contractors and agencies. We ensure effective systems and controls are in place to prevent modern slavery from occurring in any of Coastline's business supply chains.

We ensure all our contractors and third party associates closely evaluate the quality of services delivered, training and treatment and the overall reputation of companies before entering into any working arrangements.

### Responsibility

Coastline Housing Ltd has overall responsibility for ensuring this commitment complies with our legal and ethical obligations, and that all those under our control comply with it. Coastline has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

## Coastline Group Modern Slavery Commitment

Coastline colleagues are expected to notify their line manager or a member of the Senior Leadership Team as soon as possible if they believe or suspect a conflict with this commitment has or may occur and encourage everyone to raise concerns or suspicion they have in this regard in accordance with Coastline's Whistleblowing Policy and Safeguarding Policy.

If anyone is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, we ask it is raised with a line manager or member of the Senior Leadership Team for support. Coastline encourage openness, providing support to anyone who raises genuine concerns in good faith, even if they turn out to be mistaken.

No one will suffer any detrimental treatment as a result of reporting in good faith their suspicion of modern slavery in any part of our own business or in any of our supply chains.

### **Communication & Awareness**

Training on this commitment and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. All Heads of Service undertake Modern Slavery Training every three years, ensuring suitably senior colleagues are aware of and leading on, the stance against modern slavery.

Our zero-tolerance approach is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them, written into our service contracts and reinforced as needed thereafter.

### **Monitoring and Compliance**

Management at all levels are responsible for ensuring those reporting to them understand and comply with this commitment and are given adequate information and processes that enable them to carry out appropriate checks in relation to modern slavery.

Colleagues in all roles are given an awareness during their induction to ensure it does not creep into our supply chains.

Colleagues are required to read and comply with this commitment. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

All Coastline colleagues are required to avoid any activity that might lead to, or suggest, a breach of this commitment. Any colleague that fails to adhere to this commitment may be subject to formal disciplinary action.

***Document ends***