

Coastline Group Modern Slavery Statement 2025

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. Modern slavery is alarmingly commonplace, sometimes masquerading behind less obvious or less 'serious' appearing activities such as cash in hand payments, avoidance of NI contributions, the failure to provide adequate respite during the day or week, or access to basic holiday and other statutory entitlements when undertaking live-in work for example. 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 Commitment

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. This Modern Slavery Statement is adopted by Coastline Housing Ltd and applies across our Group of companies.

This statement sets out how we deliver that commitment, understanding and mitigating the risks of slavery or human trafficking taking place within our business or supply chain, and demonstrating compliance with the Modern Slavery Act 2015 (the Act). It is intended to provide our stakeholders with information to make an informed choice about their dealings with us.

Coastline's Structure

Coastline Housing Limited ('Coastline') is a charitable housing association. Coastline was formed in November 1996 as a charity and social business. All profits are kept and used by Coastline for use in furthering the objectives of the charity and to benefit our customers and the public. Coastline provides affordable housing in Cornwall. We own and manage over 5,000 homes with a diverse mix of tenures including: affordable rent, rent to buy, supported housing and shared ownership.

Coastline has four wholly-owned subsidiaries and together these companies form Coastline Housing Group ('the Group'). The subsidiaries are:

- Coastline Services Limited ('CSL'), a building maintenance and grounds contractor;
- Coastline Design and Build Limited ('CDB'), a design and build contractor;
- Coastline Homes Limited ('CHM'), a design, construction and sale of residential housing contractor; and
- Coastline Care Limited ('CCL'), which has remained Dormant throughout 2024/25

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Coastline is registered with the Charity Commission, as a charitable company, the Regulator of Social Housing ('the RSH') as a provider of social housing, and the Care Quality Commission (CQC) for the provision of extra care provided at Miners Court.

Policies and Procedures

Coastline has a robust framework of policies, procedures and contractual arrangements in place which are designed to prevent modern slavery or human trafficking within our organisation and our supply chains. These include, but are not limited to:

- Safeguarding policies;
- Whistleblowing;
- Housing management policies and procedures;
- Business Ethics, Anti-fraud, Bribery and Money Laundering Group policy;
- Equality, Diversity and Inclusion policy;
- Health and Safety, policies;
- Contract Standing Orders;
- Codes of Conduct for staff and our Board.

Policies and procedures are reviewed in accordance with a formal timetable to ensure that they reflect current law, legislation, regulation and best practice and mitigate against risks.

Coastline's Stance as an Employer

Coastline employs more than 375 people and is committed to treating those who work for us fairly. Coastline is a Living Wage and Living Pension accredited Employer. We employ all our colleagues on at least 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.

We carry out appropriate due diligence when recruiting staff to ensure that the person has the right to work and is bona fide.

Our Supply Chain

Our commitment to these ethical ways of working extends 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 follow the Procurement Act 2023 which is designed to

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exclude suppliers involved in misconduct, modern slavery, or pose national security risk whilst improving accountability and reducing fraud.

We adhere to our Contract Standing Orders, Procurement policy and procedures, which ensures we engage with reputable contractors who comply with all relevant legislation, regulations and practices.

Our Approved Supplier and Contractor application process forms part of our Group Procurement Strategy 2025-27. The process includes questions relating to Modern Slavery and Living Wage Commitment to ensure that all suppliers align payment structures with Living Wage and meet their responsibilities under the Modern Slavery Act 2015.

Housing and Care Services

Our Safeguarding Adults policy identifies modern slavery as a type of abuse long with other forms of abuse defined in the Care Act 2014. Coastline understand its safeguarding duties under the Care Act and our responsibilities as a social landlord to keep our customers safe from abuse or harm.

Our colleagues check for signs of modern slavery, cuckooing, forced labour, and human trafficking during home, neighbourhood or scheme visits, as well as any other welfare concerns which customers or members of their household, our contractors or members of the public, may have. We are also aware that isolated individuals, people with learning disabilities, or unaccompanied asylum seekers may be at greater risk of abuse. We will look into concerns that are raised or reported, and report the matter to the relevant authorities in line with our policies and procedures.

We may also carry out tenancy audits, unauthorised subletting checks, and fraud investigations to help ensure that the people living in properties are those legally entitled to do so.

Risk Assessment and Management

Coastline has included the potential abuse of a service user or customer including modern day slavery in its risk register. Risks associated with our procurement of goods and services are managed through the procurement system.

Responsibility

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

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they have in this regard in accordance with Coastline's Whistleblowing Policy and Safeguarding Adults 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.

Training, Awareness and Communication

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

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Our Audit, Risk and Assurance Committee reviews this Modern Slavery Statement each year to ensure the statement accurately reflects Coastline's controls and continuing commitment to reducing the risk of modern slavery in our organisation and supply chain.

This Statement will be reviewed annually to meet our reporting requirements under S54(1) of the Modern Slavery Act 2015.

Signed on behalf of Coastline Housing Group



Francesca Rhodes
Chair of the Board



Allister Young
Chief Executive

Date approved by the Board of Directors: 27 November 2025