



Owl Group Modern Slavery and Human Trafficking Statement

Last updated: 12th June 2026

Introduction

At Owl Group*, we are committed to conducting business responsibly, ethically and with integrity. We have a zero-tolerance approach to modern slavery, human trafficking, forced labour and exploitation in any form.

We recognise that modern slavery remains a significant global issue and acknowledge our responsibility to take appropriate steps to prevent it from occurring within our business or supply chain. We are committed to maintaining effective systems, controls and procedures that support the identification, prevention and mitigation of modern slavery risks.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Owl Group's Modern Slavery and Human Trafficking Statement for the financial year ending 2026.

Our Business and Supply Chain

Owl Group is a UK housebuilder operating across the Midlands, delivering high-quality homes and communities.

Our supply chain includes subcontractors, labour providers, construction material manufacturers and merchants, plant and equipment suppliers, professional consultants, utility providers and other service partners who support the delivery of our developments.

While we consider the risk of modern slavery within our directly employed workforce to be low, we recognise that certain sectors within the construction industry can present a higher risk of labour exploitation. We therefore remain vigilant in our approach to managing these risks.

Our Policies

Our commitment to preventing modern slavery is supported by a range of policies and procedures, including:

- Whistleblowing Policy
- Recruitment and Employment Procedures
- Supplier and Contractor Management Procedures
- Code of Conduct
- D&I Policy



These policies reflect our commitment to ethical business practices and help ensure that concerns relating to modern slavery can be identified, reported and addressed appropriately.

Responsibility for implementing these policies rests with the Board of Directors and senior management team, who ensure that adequate resources are available to support compliance and continuous improvement.

Due Diligence Processes

We undertake due diligence measures designed to reduce the risk of modern slavery within our business and supply chain.

These measures include:

- Verifying the identity and right-to-work status of all directly employed individuals.
- Ensuring employees receive lawful contracts of employment and are paid in accordance with applicable legislation.
- Monitoring employment practices to identify potential indicators of exploitation or coercion.
- Assessing suppliers and subcontractors through procurement and onboarding processes.
- Communicating our expectations regarding ethical employment practices to suppliers and subcontractors.
- Investigating concerns raised through management channels or whistleblowing procedures.

We expect all suppliers, subcontractors and business partners to comply with applicable employment, labour and human rights legislation and to take reasonable steps to ensure the same standards are maintained within their own supply chains.

Risk Assessment and Risk Management

We regularly consider areas where there may be an increased risk of modern slavery occurring within our operations or supply chain.

Potential risk areas include:

- Use of subcontracted labour.
- Temporary or agency labour arrangements.
- Multi-tier supply chains.
- Suppliers operating in sectors known to present elevated labour exploitation risks.



Where risks are identified, appropriate actions may include enhanced supplier engagement, additional due diligence, contractual controls and ongoing monitoring.

Measuring Effectiveness

We review the effectiveness of our approach to preventing modern slavery through a range of measures, including:

- Monitoring concerns raised through whistleblowing and reporting channels.
- Reviewing supplier and subcontractor compliance processes.
- Monitoring completion of employee training.
- Reviewing recruitment and employment practices.
- Assessing the effectiveness of internal policies and procedures.

During the reporting period:

- No incidents of modern slavery were identified within Owl Group's operations.
- No substantiated reports of modern slavery were received through our reporting channels.
- Modern slavery awareness remained part of employee induction and ongoing compliance training.
- Supplier and subcontractor due diligence processes continued to form part of our procurement activities.

Training and Awareness

We provide appropriate training and guidance to employees to help them understand:

- The risks associated with modern slavery and human trafficking.
- The indicators that may suggest exploitation or coercion.
- Their responsibilities under our policies.
- How to report concerns safely and confidentially.

Modern slavery awareness forms part of our induction process and is reinforced through ongoing training and communication where appropriate.

Reporting Concerns

We encourage employees, suppliers, subcontractors and other stakeholders to report any concerns relating to modern slavery, human trafficking or unethical labour practices.



Reports can be raised through management channels or via our Whistleblowing Policy. All concerns are treated seriously and investigated appropriately. We are committed to ensuring that individuals can raise genuine concerns without fear of retaliation.

Future Commitments

Over the next reporting period, Owl Group will continue to:

- Review and strengthen supplier due diligence processes.
- Enhance awareness and training across the business.
- Monitor emerging risks within the construction sector and wider supply chain.
- Review and update policies and procedures where necessary.
- Continue promoting a culture of openness, accountability and ethical business conduct.

***Owl Group's Entities covered by this policy are:**

Owl Group Developments Ltd

Owl Homes Ltd

Owl Partnerships Ltd

Owl Homes Developments Ltd

Approval

This statement was approved by the Board of Directors of Owl Group on 12th June 2026.

Signed on behalf of the Board.

Jonathan Rumble

Statutory Director – Owl Group Developments Limited