



Orbit Modern Slavery and Human Trafficking Statement

2024/2025

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year beginning 1 April 2024 ending 31 March 2025 (FY2024/2025). It was approved by Orbit Group Limited Board on 19 June 2025 and signed by Phil Andrew, Chief Executive and Stephen Jack, Chair of Board, Orbit Group Limited Registered Society company number IP28503R ("Orbit") on behalf of Orbit on 19 June 2025.

Summary

This Modern-Day Slavery Statement outlines Orbit Group Limited's and its wholly owned subsidiaries, Orbit Housing Association Limited, Orbit Homes (2020) Limited, Orbit Treasury Limited, and Orbit Capital plc's ongoing commitment to combating modern day slavery and human trafficking within its operations and supply chains. Throughout this statement 'Orbit' or 'we' also includes all other Orbit entities, unless where a specific Orbit entity is explicitly stated.

This document provides an overview of Orbit's structure, business, and supply chains, details its policies and governance, presents its goals and key performance indicators (KPIs), and reports on actions taken in 2024/2024. Additionally, it outlines Orbit's goals for 2025/2026, emphasising the importance of modern-day slavery awareness, risk mitigation, and responsible sourcing.

During the period 1 April 2024 – 31 March 2025 (FY2024/2025) Orbit has continued to focus on issues of modern-day slavery and exploitation of people in its supply chains through its Procurement teams and Sustainability functions.

Steps taken during FY2024/2025 to ensure that slavery and human trafficking is not taking place include:

- Implemented changes via an Action Plan sponsored by the Chief Regulatory & Governance Officer.
- Promoted awareness of the risk of Modern Slavery and transparency of supply chains, across Orbit via its purpose and vision and through our supply chain.
- We voluntarily adhere to the rates of the Living Wage Foundation for colleagues we employ and review the employment practices of our prime suppliers to understand their rates of pay.
- Registered our Modern Day Slavery Statement with [UK Government's Modern Slavery Statement Registry](#) and [TISCReport](#) and used [TISCReport](#) (Transparency In Supply Chains Platform) to assess and monitor compliance within its supplier base, encouraging suppliers to register.
- Based on an analysis by [TISCReport.org](#) 168 suppliers in Orbit's supply chain are required to submit a Modern Day Slavery Statement. The [TISCReport.org](#) analysis showed 21 (13%) suppliers as potentially non-compliant due to non-visibility of a Modern-Day Slavery Statement on their websites. A further review of these potentially non-compliant suppliers

determined that 8 were confirmed as not being required to submit a statement or were no longer active suppliers with Orbit. Only 2 live suppliers were identified as being liable to publish a statement in accordance with s54 of the Modern Slavery Act 2015 but such a statement cannot be identified at present.

- Work is underway with the non-compliant suppliers to determine whether they are required to publish a statement.
- Enrolled and encouraged our suppliers to enrol with [Open Supply Hub \(OSH\)](#).
- Reviewed Orbit's supply base for all Orbit companies whereby suppliers are contracted against Orbit's standard contract terms which include Modern Day Slavery reporting requirements.
- Introduced risk assessments in line with [Cabinet Office Guidance Procurement Policy Notice 02/23 Tackling Modern Slavery in Government Supply Chains](#) - Guidance to assess and manage risk for those categories at highest risk of modern slavery including - Audio visual & IT Equipment, Construction materials, Recruitment agencies, Travel, and Waste management.
- Audits were conducted by Orbit's Internal Audit team across all Orbit Homes' construction sites during FY2024/2025. The findings of these reports have been circulated and action plans remain ongoing.
- Introduced enhanced due diligence processes during supplier evaluation stages.
- Rolled out mandatory training for Procurement staff in line with Government Commercial Function guidance. This had been completed by 70% of Procurement staff by 31 March 2025.

Introduction

Orbit remains resolute in its commitment to make a positive difference to our customers and society and to create a sustainable and resilience model for the future. At Orbit, dedication to safeguarding and upholding human rights is key to these commitments. Orbit maintains a zero-tolerance stance towards any manifestation of slavery or human trafficking. This statement reflects Orbit's dedication to transparency, ethical business practices, and human rights. As a leading housing group in the UK, Orbit recognises its responsibility to ensure that its actions align with its values.

In 2016, Orbit published its first Modern Day Slavery Statement, followed by annual updates. This document is the update for the financial year ending 31 March 2025. This work has primarily been led by Procurement teams and Regulatory and Compliance (including Sustainability) teams.

Since the first statement, Orbit has committed to the following principles:

- Commitment to better understand its supply chains and work towards greater transparency and responsibility towards people working in them.
- Raise awareness of how to identify and report suspected Modern Slavery.
- Monitor supply chains that have been identified as a potential risk and take appropriate action as necessary.
- Implementation and enforcement of effective systems and controls to tackle slavery and human trafficking which may be taking place in our supply chains.
- Provide appropriate training to our staff to raise awareness of Modern Slavery and how to identify potential risks.

Orbit's Structure, Business, and Supply Chains

Orbit is a leading housing group with 1,385 staff and managing a portfolio of homes for over 100,000 customers across the West Midlands, South East of England and East of England.

Founded in 1967 by two people on a park bench contemplating how to tackle homelessness. The passion they felt about the inequality in the access, scale and quality of available housing was channelled into positive action, and Orbit was created.

Socially driven and commercially minded, our purpose today is every bit as important as it was when Orbit was founded.

Orbit's activities are guided by our [Sustainability Strategy](#) and [the United Nations Sustainable Development Goals \(UN SDGs\)](#).

Orbit is comprised of 1 Group company and 4 subsidiary companies with specific purposes.

Orbit is a Registered Society documented on the Mutuals Public Register maintained by the Financial Conduct Authority and receives funding from multiple sources to support our activities.

Orbit Group Limited, company number IP28503R is the Group's parent company, owns our shared ownership homes and provides strategic and corporate support services to the Group.

Each of the subsidiary companies report to the Common Board of Directors which meets quarterly and which is attended by a representative of Orbit's Executive Team/ Board.

- Orbit Housing Association Limited, IP27802R is our operating association and manages our homes across the Midlands, East and the South East.
- Orbit Homes (2020) Limited, 06950748 is the development and sales arm of the Group and has increased the range of tenures we can provide for our customers. It specialises in building new homes for Market Rent, Market Sale, Shared Ownership and Affordable Rent.
- Orbit Treasury Limited, 06264601 is a special purpose vehicle created to co-ordinate borrowing across the Group and offer advantageous interest charges to Group members. It is used to raise and manage the private finance needed to meet the Group's funding requirements.
- Orbit Capital plc, 09402193 is a public limited company established to receive the proceeds of bonds issued on behalf of the Group.

Our business

Orbit endeavours to uphold our purpose of being socially driven and commercially minded, to address inequality in the access, scale and quality of available housing.

Orbit is governed by a Common Board of Directors, responsible for overseeing the management and administration of Orbit in accordance with the National Housing Federation Code of Governance 2020, which is the adopted code of Orbit Group.

The Common Board is responsible for endorsing Orbit's purpose, vision, values and commitments. The Common Board delegates its responsibilities to the Chief Executive Officer, overseeing the corporate, financial, estate, and human resources management of Orbit. The governance structure and the functions of the Board are transparent and accessible to the public. This Modern Slavery Statement has been prepared by Procurement in consultation with Internal Audit and Sustainability teams and is applicable across all subsidiaries.

We manage a growing portfolio of over 46,000 affordable and social rent homes and support over 100,000 customers in differing stages of life, from those seeking their first home to customers looking for enhanced supported living. We are also one of the UK's largest developers of affordable housing and delivered over 900 new homes during FY2024/2025.

Locations

Orbit's corporate headquarters are in Coventry however we have offices and homes across the UK. Office locations include Bexley, Hastings, Maidstone, Margate, Norwich and Stratford Upon Avon.

Orbit's Supply Chain

Orbit spent in excess of £300m inc. VAT during FY2024/2025, procuring goods and services. Our supply chain encompasses third-party suppliers covering a wide range of products and services.

Orbit's commitment to sustainable practices is at the core of how we manage our supply chain activities, impacting Orbit's financial stability, reputation, risk management, and our sustainability aims. We are dedicated to forming partnerships with suppliers who not only share our values and principles but also exhibit innovation and competitiveness through our Procurement function.

Orbit procures a diverse array of goods and services that are essential for the efficient operation of the organisation. These requirements span various supply chains, including:

- Audio Visual (AV) and IT Equipment
- Civil engineering & groundworks
- Construction materials – particularly timber
- Decarbonisation (photo voltaic panels and batteries)
- Legal services
- Local government
- Recruitment agencies
- Services (alarm monitoring, repair, maintenance and specialised activities)
- Travel

Goods and services are sourced from suppliers around the world, encompassing a wide spectrum of entities, from individuals and local small and medium-sized enterprises (SMEs) to large multinational corporations. As a part of supplier due diligence, Orbit continues to document the head office locations of suppliers and their policies, particularly in areas such as modern day slavery and human trafficking. To comprehensively understand the likelihood of exploitation within different supplier categories, Orbit conducts thorough risk analyses, allowing it to prioritise action based on these risks. Orbit partners with several Tier 1 organisations (those directly contracted with us), working with them to closely map and examine their supply chains, proactively identifying potential risks to further underscore its commitment to sustainability.

Modern Day Slavery and Human Trafficking Policies

Addressing modern day slavery is a priority for Orbit. As part of its commitment to fair working practices for all, Orbit asks suppliers to comply with the following policies which support fair working practices for all and ensure it buys ethically.

Policies and Governance

Policy	Purpose	Owned by	Published	Subsidiary policy position - where different
Supplier and Contract Management Policy	Group approach to procurement, supplier onboarding and supplier performance management	Procurement	May 2022	
Procurement Policy	Procurement strategy	Procurement	February 2025	
Procurement Procedure	Ensure delivery of value for money. Detail around procurement of goods, services or works.	Procurement	November 2022 (subject to live revision)	
*Orbit Homes Subcontract Procurement Procedure	Procurement of subcontractors for use on direct build developments	Orbit Homes Commercial	June 2022	Yes
Orbit Code of Conduct	Governance of suppliers conduct when working for Orbit or on Orbit sites	Procurement	2017	
Probity and Anti-bribery Policy	Business conduct in honest and ethical manner. Zero tolerance to bribery and corruption.	Business Assurance	Sept 2022	
Whistleblowing Policy		Business Assurance	Sept 2023	
Standard Terms and Conditions of Purchase	Applies to all purchases	Procurement	Feb 2020	
Sustainable Supplier Charter		Sustainability		

Summary of Governance

Orbit demonstrates a continuous dedication to its environmental responsibilities. The CEO and Executive team channel sponsorship, leadership, and resources toward minimising Orbit's environmental footprint through the Executive Team.

Additionally, the Common Board conducts an annual review of Orbit's sustainability report.

The Sustainability Steering Group has been established to oversee the composition and implementation of Orbit's approach to sustainability. In particular, the delivery of [the Sustainability Strategy](#) and the [Sustainable Finance Framework](#). Representatives from Orbit Group and Orbit Homes participate in this Steering Group. The central Procurement function has consulted with representatives from affected teams in the preparation of this year's statement.

The committee is the forum for all key stakeholder representations to meet, review and agree key sustainability initiatives, propose, targets and monitor performance.

Sustainability is an integrated agenda item across all Board Committees with appropriate updates.

The Audit Risk and Assurance committee is the principal body responsible for overseeing Orbit's governance of Modern Slavery.

Goals and Key Performance Indicators (KPIs)

Orbit's KPIs focus on:

Orbit has monitored progress against an action plan developed to reinforce the approach, policies, and procedures aimed at mitigating the risk of Modern Day Slavery within its supply chain.

The specific actions that have been put into effect are outlined in this Statement:

- Improved policies associated with key risk areas
- Enhanced supply chain mapping
- Introduction of Key Performance Indicators
- Processes in support of Supply Chain Policy
- Collaboration and approved contracted suppliers
- Enhanced training - [Tackling Modern Slavery in Supply Chains: PPE Case Studies training](#)

Orbit has further advanced transparency by sharing its Modern Day Slavery Statement on both the [UK Government's Modern Day Slavery Statement Registry](#) and continuing to work closing with the Transparency in Supply Chain ([TISC](#)) platform. In addition, Orbit has assessed its supply chain's compliance in alignment with the [TISC](#) dashboard and actively encouraged suppliers to register on the platform. Orbit's commitment to sustainability is unwavering, and as a Contracting

Authority we require suppliers to provide action plans or ESG (Environmental, Social, and Governance) policies. Orbit also actively promotes best practices throughout its supply chain network.

Reporting and Assessing the Risk of Modern Day Slavery (Actions Taken 2024/2025)

Living Wage

We voluntarily adhere to the rates of the Living Wage Foundation for colleagues we employ and review the employment practices of our prime suppliers to understand their rates of pay.

Reporting

Orbit's commitment to combat modern day slavery is exemplified by its registration of the Modern Day Slavery Statement with both [the UK Government's Modern Slavery Statement Registry](#) and [TISCreport](#) (organisations recognised by UK Government as central repositories for section 54 Modern Slavery Statements in the interests of promoting transparency). Through [TISCreport.org](#), in FY2024/2025 Orbit has actively assessed and monitored compliance within its supplier network, while actively encouraging its supply chain partners to join this initiative.

Within Orbit's supplier base, which exceeds 6,000 suppliers, it identified:

- 168 suppliers eligible to provide statutory Modern Day Slavery Statements, collectively representing £212 million or 71% of Orbit's third-party expenditure during FY2024/2025.
- The [TISCreport.org](#) analysis showed 21 (13%) suppliers as potentially non-compliant due to non-visibility of a Modern Day Slavery Statement on their websites. A further review of these potentially non-compliant suppliers determined that 8 were confirmed as not being required to submit a statement or were no longer active suppliers with Orbit.
- Only 2 live suppliers were identified as being liable to publish a statement in accordance with section 54 of the Modern Slavery Act 2015 but such a statement cannot be identified at present.
 - Work is underway with the non-compliant suppliers to determine whether they are required to publish a statement.

In our pursuit of transparency and compliance, we have enrolled and actively encouraged suppliers to participate in [the Open Supply Hub](#). This hub offers comprehensive factory-level information on manufacturing plants worldwide, with a primary focus on high risk products, providing further assurance as to our supply chain. We continue to work with industry experts to identify industry specific knowledge centres.

Supplier consolidation

Orbit continues to review the risk profile of suppliers with whom it has low value spend. Actions are also in place to review the supply base and consolidate suppliers via Preferred Supplier Lists whereby suppliers are contracted against Orbit's standard contract terms which include Modern Day Slavery reporting requirements.

Assessment of risk

Orbit has evaluated its purchasing categories using risk assessment guidance set out in the UK Government's modern slavery procurement guidance and risk data from a range of sources, in particular the [International Labour Organization's Global Estimates of Modern Slavery \(GEM\)](#) (pdf) and the [US Department of Labor - List of Goods Produced by Child Labor or Forced Labor](#). Both these reference points are used to qualify the modern slavery risk of goods and products used by Orbit.

Risk categories are as follows:

- Country of origin
- Sector
- Transaction type
- Business partnership
- Subcontracting

The highest risk categories (based on risk and spend) therefore are:

- Audio Visual (AV) and IT Equipment
- Civil engineering & groundworks
- Construction materials – particularly timber
- Decarbonisation (photo voltaic panels and batteries)
- Recruitment agencies
- Travel
- Waste

Managing the Risk of Modern Day Slavery (Actions Taken 2024/2025)

Orbit maintains an ongoing commitment to regularly review action plans as part of annual efforts to comprehend and address any risks effectively. Terms and conditions are clear, explicitly articulating the need to adhere to Modern Day Slavery legislation, as well as Orbit's own comprehensive policies concerning Modern Day Slavery and Human Trafficking.

For Orbit's main service contracts, which encompass crucial services such as cleaning, management of repairs and maintenance, and waste collections, we engage third-party companies for their services. These companies employ a diverse workforce, comprising both UK and non-UK staff.

To address Modern Day Slavery risks comprehensively, Orbit has integrated measures directly into each phase of procurement activities. Orbit required continued maintenance of rigorous policies and the conducting of regular audits from suppliers across their supply chains, ensuring the highest standards of ethical conduct. Additionally, there are stringent obligations in place to promptly report any breaches or violations, emphasising Orbit's commitment to ensuring ethical practices throughout its supply chain.

Audio Visual (AV) and IT Equipment

Orbit purchases electronic equipment, including IT hardware and AV equipment, with parts (including minerals) sourced globally and predominantly manufactured in Asia. Hardware purchases are centralised and standardised via a central supplier – a signatory to the UN Global Compact committed to upholding internationally proclaimed human rights.

Orbit's AV and IT equipment is provided by approved suppliers who have been selected following competition. Part of the sourcing criteria is compliance with Modern Day Slavery legislation. Orbit has reviewed the Modern Day Slavery and Human Trafficking policies and Conflict Mineral Statements of its Original Equipment Manufacturers (OEM), the supplier in turn states, "Lenovo believes in the benefits of having an industry standard supply chain code of conduct and therefore implements the [RBA Code of Conduct](#) internally within Lenovo global manufacturing locations and externally across its supply chain. Lenovo has been a member since 2006 and supports RBA efforts to ensure that working conditions in the electronics industry supply chain are safe, workers are treated with respect and dignity, and that business operations are environmentally responsible, do not fund conflict and are conducted ethically" Orbit continues to supplier monitor performance via reporting tools such as [Electronics Watch](#).

Construction materials

Orbit Homes built 900+ affordable homes during FY2024/2025. We work with various contractors, groundworks providers, materials' providers and subcontractors across various construction sites. In the construction industry there is a risk of forced labour being used. We voluntarily adhere to the rates of the Living Wage Foundation for colleagues we employ and review the employment practices of our prime suppliers to understand their rates of pay. All main contractors had and continue to have rigorous modern day slavery provisions in place.

We recognise that many materials used in construction represent high risks of modern slavery. We ensure that reviews of companies' codes of conduct and ESG strategies are conducted prior to the award of contract and we will begin to focus more on responsible procurement during FY2025/2026.

We continue to review sources of our construction materials. According to [Global Slavery Index](#), the UK is the 3rd largest importer of timber products (identified as high risk product for modern slavery). We recognise that there are global shortages of timber (due to pest issues in Canada) and seek to source FSC accredited products and operate in accordance with the The Forest Law Enforcement, Governance and Trade (FLEGT) Regulation (Council Regulation (EC) No 2173/2005) to mitigate against the risk of modern slavery entering our supply chain.

Recruitment Agencies

Recruitment of staff is identified as a high-risk area for modern day slavery. Most of Orbit's temporary labour demand is via a dedicated organisation under an agreement introduced in 2017. This organisation has clear policies in relation to Modern Slavery and Human Trafficking and ensures all new suppliers sign up to their Supplier Code of Conduct which includes the following standards:

"Strict compliance checks for all workers supplied or managed by us to ensure adherence to high standards for all workers under our supervision. Before any worker is onboarded or placed, our teams adhere to a zero-tolerance stance through the verification of a worker's identity and their Right to Work in accordance with the laws applicable in the jurisdiction they are in.

We do not withhold any worker identity or immigration documents for any purpose whatsoever and

this is embedded in our processes and procedures. Our central compliance function ensures compliance with this ensuring any potential issues are escalated before onboarding. We regularly complete due diligence on the umbrella companies, employers of records, professional employment organisations and similar in our supply chains. These due diligence checks and audits ensure we collaborate only with partners who align with nGAGE's (parent company) own compliance standards."

To date no incidents of modern day slavery have been identified. Similar checks are used for permanent recruitment agencies to reduce the risk of modern day slavery.

Travel

The provision of travel management services has been rated as medium risk for modern day slavery due to the majority of services being procured from UK suppliers for travel in the UK. Orbit's travel management provider operates a global supply chain, reviews its supply chain and has a formal escalation process in case serious issues affecting working conditions are found within the supply chain.

The travel management provider provides a risk based assessment across locations and provision of services.

"Aligned with the [Global Slavery Index 2018](#), CTM has adopted a risk framework to identify those upstream and downstream suppliers with a perceived risk towards modern slavery. As a result, 35 Tier 1 (Suppliers) and 109 Tier 2 (Travel Partners) were identified as perceived moderate to extreme-risk supply chain stakeholders for the Group. These suppliers were requested to complete a modern slavery assessment survey to assist in quantifying the risk severity as part of the FY2023 modern slavery assessment."

In FY2024, our travel management provider continued to collaborate with all partners with a focus on SMEs downstream and upstream suppliers, to enhance greater transparency in the due diligence and procurement process.

As part of the FY2023 modern slavery risks assessment process conducted by the travel management provider, 5 of their suppliers were assessed as a moderate risk due to insufficient information provided on their surveys to confirm their modern slavery risks awareness and governance practices. Separately, 1 supplier was identified via a third party as a potential risk due to allegations of modern slavery practices.

To quantify the risks posed by the 5 suppliers identified with a moderate risk profile, further actions were undertaken in FY2023 with the identified suppliers to establish the extent of modern slavery governance within their business. These actions included:

- Internal review with subject matter experts to quantify the modern slavery risks (if any);
- Direct engagement with each identified supplier to review the assessment outcome and verify their modern slavery governance framework (if any); and
- Detailed re-assessment on the supplier's modern slavery risk profile.

Through this process, all 5 identified suppliers were able to verify their modern slavery governance framework and re-classified as a minor risk, with no further actions required.

Regarding the 1 supplier identified as a potential risk due to allegations of modern slavery practices. Upon the travel management provider seeking clarification of the supplier's position, the supplier was able to present information relating to the allegations to confirm it did not engage in modern slavery practices.

The travel management provider's modern slavery risk framework identifies specific response mechanisms should they identify a potential or heightened risk of modern slavery in the supply chain.

Further, should a modern slavery risk be substantiated, their process is to encourage our supply partner to self-report or, depending on the severity level, allow the travel management provider to report the issue on their behalf.

During FY2024/2025 reporting period, no substantiated issues of modern slavery were identified by the travel management provider.

Waste and Recycling Services

During FY2024/2025 a competitive process has been run by Orbit Procurement to identify a single supplier for waste and resource management across the various sectors of our organisation.

A risk assessment conducted prior to the procurement exercise identified this as a high risk area for modern slavery. The preferred supplier has been selected on various grounds including their commitment to "... *eradicating incidents of modern slavery, by assessing where in the business these opportunities may arise. ... The supply chain is made up of businesses including large multi-national organisations through to SMEs which supply services across all brands to ensure ... operations run smoothly, both directly and indirectly.* Within the brand sectors the highest risks from exposure to modern slavery stem from engagement with recruitment agencies across all sectors, and supply chains within countries identified as having a higher estimated prevalence of forced labour ([Global Slavery Index](#)) . This conclusion is also based on anecdotal evidence within industry focused modern slavery working groups and analysis of evidence-based research conducted by charities in the field, including

[Hope for Justice](#), and [Stronger Together](#)."

Within the supplier's corporate organisation each brand, is responsible for conducting a risk assessment to identify where hot spots for modern slavery may be in their operation or supply chain and actions to manage the risk and react where necessary. The [Global Slavery Index](#) is used, as is the latest updates on key demographics defined by the [UK Gangmasters and Labour Abuse Authority \(GLAA\)](#).

To support identification, advice from the [GLAA](#), [Hope for Justice](#), the [International Labour Organisation](#) and relevant Government guidelines are accessed.

When visiting new or current suppliers, assessing teams have defined checklists to focus attention on issues around modern slavery, that ask probing questions to help identify concerns.

All risk assessments are reviewed on an annual basis, unless changes are made through legislation, industry practice, or an incident occurs. Under any of these circumstances, policies will be reviewed earlier.

Due diligence

Enhanced Questions

When procuring goods or services identified as high risk, Orbit continues to use best practice additional questions derived from [UK Government's Transparency in Supply Chain's Guidance](#).

Supplier management

Orbit maintains records of contracted Suppliers including the following information:

- Modern Day Slavery Statement compliance and registration
- Sign up to [TISC](#)
- Records supplier accreditation, compliance and registration with bodies such as [Sedex](#) or the [Open Supply Hub](#)
- Shows if the supplier has a Carbon Reduction Plan and action plan for Modern Day Slavery
- Orbit is engaged with suppliers to promote greater alignment with Orbit's values.

Staff Engagement Actions

To support Orbit's efforts to promote awareness and risk identification of factors of Modern Slavery mandatory training will be rolled out to all staff.

Enhanced training has been rolled out to all Procurement staff (including new starters) using the [UK Government Commercial Function's Tackling modern slavery in supply chains: PPE case study](#) – 5 modules of e-learning and certificate.

Compliance rates for end FY2024/2025 were 71% of eligible staff (25 people within a team of 35). Line managers are working with staff to improve total compliance. All new starters are required to complete mandatory training within 6 weeks of joining Orbit. As at 30th April 2025 37 members of staff (35 in Procurement and 2 from Internal Audit) have completed this training. (This figure includes new starters and leavers).

As Orbit progresses in FY2025/2026, it remains dedicated to the continual monitoring, improvement, and transparent reporting of all Modern Slavery course completion rates. Orbit's goal is to ensure that staff are well-informed and equipped to champion ethical and responsible procurement practices throughout the organisation.

Supplier Engagement Actions

Following a review of the supplier base via [TISC](#), 168 of Orbit's suppliers are required to comply with the Modern Slavery Act 2015; 145 have provided the relevant statements. Of the 21 suppliers identified as potentially being required to comply but not having provided a statement, 8 were confirmed as not being required to submit a statement or were no longer active suppliers with Orbit. Orbit is working actively with the remaining 2 suppliers to ensure compliance in 2025-2026. It continues to encourage SME suppliers to complete action plans.

Whistleblowing

In accordance with our Whistleblowing Policy, all staff are encouraged to report any concerns either to their line manager, the Whistleblowing Officer, a senior manager or via [Safecall](#) (an external organisation appointed by Orbit for this purpose). Posters (including a QR code) are published at all sites outlining these details and the contact details are available via the intranet.

Goals and KPIs for FY2025/2026

Orbit's goals for FY2025/2026 include:

Building on the progress made so far and signalling some of the planned areas of focus in this Statement.

Policies

Orbit's Procurement Policy has been reviewed and updated early 2025 in line with Procurement Act 2023. This will continue to be reviewed, and its procedural outline can be found on the Procurement Services' area of the intranet.

We are rolling out revised templates for competitive sourcing, incorporating additional governance measures for procurements that carry medium and high risks related to Modern Day Slavery.

Furthermore, as part of Orbit's continuous supplier management efforts, we are incorporating modern day slavery and sustainability topics into ongoing practices. We remain actively engaged with both suppliers and other public sector Procurement Consortia to identify and champion best practices in these areas.

Assessment of risk

Orbit will evaluate its spend categories using risk assessment guidance set out in the UK Government's modern slavery procurement guidance and risk data from a range of sources, in particular the [International Labour Organization's Global Estimates of Modern Slavery 2022 \(pdf\)](#) and the [US Department of Labor - List of Goods Produced by Child Labor or Forced Labor](#).

Risk categories remain as follows:

- Country of origin
- Sector
- Transaction type
- Business partnership
- Subcontracting

The highest risk categories (based on risk and spend) therefore are:

- Audio Visual (AV) and IT Equipment
- Civil engineering & groundworks
- Construction materials – timber and other materials identified as high/medium risk
- Decarbonisation (photo voltaic panels and batteries)
- Recruitment agencies
- Travel
- Waste

Risk

We will continue to work with our supply chain to identify areas of high – medium risk of modern slavery and work with our supply chain to under the steps in place to identify and mitigate the impact of this.

Further to previous actions from Internal Audit to mitigate the risk of modern slavery on our construction sites, we are seeking to engage with industry partners and bodies such as Chartered Institute Of Building (CIOB) (who have produced [a best practice toolkit](#) via [Stronger2gether](#) specifically for the construction industry and [Supply Chain Sustainability School](#) to rollout toolbox talks across our sites to identify and report any instances of modern slavery. This work is supported by the Executive Management Team.

In recognition of the risks involved in Photo Voltaic (PV) panels and batteries for solar energy we are reviewing the asset register of parts against manufacturers identified by the US Department of Homeland Security (DHS) via the prevailing [Uyghur Forced Labor Prevention Act \(UFLPA\) Entity List](#). Initial checks show that at least one of our providers is annually audited by NICEIC in accordance with the [Microgeneration Certification Scheme](#). This scheme has the benefit of detailing all products certified and stating the manufacturer of these parts for traceability. The Solar Stewardship Initiative Board has conducted further investigations of manufacturers based on publication on the [UFLPA Entity List](#) to provide assurance to users of some of these products. We will continue to review the list and parts with our prime contractors. We recognise the opacity of supply chains within China and the sector wide risk of modern slavery in green energy production and will continue to work with industry bodies to adopt and support best practice.

We will also initiate a review of the risk profile of suppliers with whom Orbit has low value (tail) spend as particular areas of risk.

Orbit will continue to assess and monitor the risks of modern day slavery at every stage of a procurement. Through ongoing supplier engagement, we review practices within the supply chain.

Supply chain mapping

We will continue to develop our supply chain map (tier 1, tier 2, tier 3 and eventually tier 4 at raw materials level) to identify risk of modern slavery in our supply chain and implement appropriate steps to mitigate these risks. In response to the US Tariffs outlined 2nd April 2025, we have commenced mapping the supply chain to further qualify risk.

Due diligence

Orbit will review revised terms and conditions for low spend goods/ services and continue to monitor modern day slavery risks and compliance via the tools set out above.

Orbit continues to engage in dialogue with and monitor accreditation and certification bodies for best practice and promote collaboration with suppliers to identify and report any incidences of modern day slavery.

Orbit is also seeking to roll out mandatory modern slavery training to all staff in accordance with best practice (as well as those involved in Procurement activities who have already completed separate, in depth training).

Enhanced supply chain mapping

Category management plans will be created and deployed during FY2025/2026 with a particular focus on high and medium risk areas. These are used to examine other supply chain tiers.

Orbit aims to streamline its compliance checks and reporting processes related to modern day slavery and risk assessments.

Key Performance Indicators

- Staff training
 - Target of 95% completion rate for mandatory training modules for eligible staff
- Supplier audits
 - Complete and review 5 site and 10 supplier audits as part of ongoing supplier relationship management programme
- Supplier modern slavery statement compliance
 - Maintain transparency of supply chain compliance via the

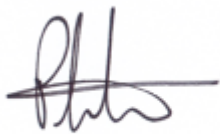
- TISCreport.org supplier dashboard
 - Investigate all instances of reported non-compliance
- Whistleblowing
 - Report and investigate 100% of whistleblowing cases made to Orbit.

Monitor and review the outcomes of whistleblowing cases reported by our partners.

Orbit will continue to work with [TISCreport](https://TISCreport.org) to publish its Modern Day Slavery Statement and review its supplier base. The outputs of this activity are publicly available.

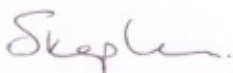
Approved by the Common Board on 19/6/2025.

Signed by



Phil Andrew, Chief Executive Officer, Orbit Group Limited

Signed by



Stephen Jack, Chair of Orbit Group Limited

