

## **Statement on Modern Slavery Act 2015**

This statement is made on behalf of P J Livesey Group Limited (Company Number 05942887) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes our slavery and human trafficking statement for the financial year-end 30th June 2027 (2026/2027).

The statement sets out the steps that we continue to take to prevent modern slavery and human trafficking in our business and supply chains. P J Livesey Group Limited intend to work only with suppliers and manufacturers from a position of trust, teamwork, honesty and mutual respect. We expect all of our business partners to operate on the same principles. The following Code of Conduct outlines our minimum expectations in various areas, and we expect all businesses involved in the production of products and works for P J Livesey Group Limited to review and join in its implementation, working together to achieve continual improvements.

### **About P J Livesey Group Limited**

For over 40 years the P J Livesey Group has been at the forefront of specialist property development and restoration, taking a determined approach to put quality first every time. The company was founded in 1979, and we have built our reputation through the painstaking renovation of some of the finest period properties in the country.

Our strength is residential development, providing long term futures to historic buildings and their grounds. Every scheme is designed from scratch with no standard house types or solutions. Our aim is to create sustainable developments in which people want to live, and we are proud of how closely we work with owners, local authorities and communities to secure planning for new uses.

Partnerships are a key cornerstone in our success, and over the years we have formed excellent relationships with local authorities, conservation groups such as English Heritage, the Victorian Society, the Georgian Group and most major national house builders.

We took the step right from our inception to look holistically at the difficulties of successfully converting buildings and to provide a single solution that covers aesthetics, design, construction, costs, interior design, furniture and fittings.

This in-house philosophy will continue to be the major factor in how we approach our developments in the future. Wherever we build our developments, whatever the property prices, a P J Livesey home allows you to make the most of your life. This comes from always thinking about, and listening to, how people are living their lives before putting pen to plan, and that makes for a home that’s designed with real individuality as well as genuine practicality, both in the big things and the little touches.

The P J Livesey Group vision grew to include new build developments, combining the renovation of a period property with the construction of new housing within its grounds. Our central design philosophy has remained the same throughout our growth.

### **Due Diligence on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery, servitude and forced compulsory labour or human trafficking in our supply chains or in any part of our business.

As part of this due diligence, we have identified our high-risk areas:

### **Our High-Risk Areas**

We have identified areas within our business where there is a higher risk of modern slavery. These include construction sites and subcontractors, procurement of building materials, and contracted services such as cleaning, security, and maintenance. Additionally, certain overseas suppliers may present a higher risk due to labour practices in their regions. We regularly assess these areas and take steps to mitigate any risks identified.

As part of our initiative to identify and mitigate risk in our supply chains, especially those that are identified as high-risk, we continue to develop internal systems and controls to ensure our supply chain and those who work for us implement our policy. We:

- carry out 'right to work' checks on all new employees joining the company through our Group HR function;
- monitor working conditions on our sites through regular welfare audits;
- continue to enhance our comprehensive employee verification checks and comply with all our obligations under applicable employment laws;
- continue to use posters, wallet cards and our staff newsletters to promote our confidential reporting facility where concerns, including any regarding slavery, human trafficking and illegal working, can be raised;
- have a zero-tolerance procurement policy, which requires Group suppliers and sub-contractors to confirm that they comply with the Act. We have the right to audit as a standard condition within supplier and sub-contractor contracts;
- continue to review our procurement processes to consider what, if any, adjustments might be made to further reduce the level of risk of slavery and human trafficking in our supply chain

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values we require that our zero-tolerance approach is communicated to all suppliers, sub-contractors and business partners at the outset of our business relationship and that it is reinforced, as appropriate, thereafter. We will cease to engage individuals and organisations working on our behalf if they do not comply with the Modern Slavery Act 2015.

### **Freedom of Association**

- Suppliers shall recognise and respect the right of workers to lawfully join associations of their choosing, and to bargain collectively.
- P J Livesey Group Limited adopts an open attitude towards the activities of trade unions and their organisational activities.
- Workers' representatives are not to be discriminated against and will be given access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer will facilitate, and does not hinder, the development of parallel means for independent and free association and bargaining.

### **Employment is Freely Chosen**

- Suppliers shall uphold the human rights of all workers and treat them with dignity and respect.
- There shall be no forced, bonded or involuntary prison labour or any form of human slavery, servitude or human trafficking.
- 'Human Trafficking' means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payment or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
- P J Livesey Group Limited strictly prohibits any exploitative labour practices or any associated criminal conduct.
- Workers are not required to lodge "deposits" or their identity papers with their employer, and are free to leave their employer after reasonable notice.

### **Child Labour**

- There shall be no recruitment of child labour.
- Children who are younger than the permitted minimum age by the law of the country of manufacture, or who are younger than the age for completing compulsory education shall not be employed.
- Children and young persons under the age of 18 shall not be employed at night or in hazardous conditions.
- The company must maintain documentation for every worker, verifying the workers date of birth. Where official documents are not available, a company must be seen to take all the steps to verify the age of a person.
- Companies shall develop a policy to provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child.

### **Discrimination**

- Workers should be employed on the basis of their ability to do the job, rather than their personal characteristics or beliefs
- No person shall be subject to discrimination in hiring, access to training, salary, discipline, promotion, termination, race, nationality, marital status, age, pregnancy or maternity, caste, disability, sexual orientation, gender reassignment or identity, religion or belief, sex, union membership or political affiliation.

### **No Harsh or Inhumane Treatment is Allowed**

- Every employee shall be treated with respect and dignity
- Workers shall not be subjected to any form of physical, sexual or mental harassment or verbal abuse.

### Hours of Work

- Employees should not be required to work more than the maximum regular and overtime hours allowed by the law of the country of operation. No more than 48 hours per week (averaged over a 17-week period) are worked on a regular basis and no more than 12 hours per week overtime on a regular basis.
- Workers must be compensated at a premium rate according to national law
- Holidays should be granted in accordance with local laws and employees shall be given, except in extraordinary business circumstances, at least one day off per week.

### Wage and Benefits

- Wages and benefits paid for a standard working week must meet, as a minimum, national legal standards.
- P J Livesey Group Limited will seek to work only with suppliers who ensure wages paid meet basic needs and provide some discretionary income.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Any deductions must be at a rate that is fair and reasonable by local standards and must be lawful and not discretionary.
- Deductions from wages as a disciplinary measure shall not be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

### Health and Safety

- Suppliers must provide a safe, clean and hygienic place of work and keep to all local laws relating to health, safety and welfare in the workplace. This requirement also applies to any accommodation provided for the workforce.
- The company observing the code shall assign responsibility for health and safety to a senior management representative.
- Exits must be clearly marked, be accessible and must be unlocked while work is taking place. Fire prevention and evacuation procedures and alarms must exist and be tested regularly.
- First Aid facilities must be available.
- Access to clean toilet facilities and to drinking water, and, if appropriate, sanitary facilities for food storage shall be provided.

### Environmental Requirements

- Suppliers must manage all waste that they generate in accordance with applicable environmental laws and regulations and must continually work to reduce the percentage of waste going to landfill.
- Suppliers should be aware of their carbon footprint and commit to a strategy of carbon reduction.
- Suppliers should look to reduce the level of packaging used and improve the recyclable content of both their products and packaging.

## Audits

- Inspections will take place as often as appropriate to assess compliance with this statement.
- Suppliers should promptly report to P J Livesey Group Limited with any known breach of this Code and take corrective action within a specified time period if concerns are found.

## Policies

In addition, we operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Recruitment Policy - We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy - We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Code of Conduct - This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30th June 2027.**

**Our stance on the Modern Slavery Act 2015 and Human Trafficking has been reviewed by our HR Provider and approved by the board of Directors of P J Livesey Group Limited, with the requirements of the MSA, it will be reviewed and updated annually.**

## P J LIVESEY GROUP LIMITED

Ashburton Park Ashburton Road West Trafford Park Manchester M171AF

Signed :



**Print : GEORGINA LYNCH**

**Position : MANAGING DIRECTOR**

**Signed : June 2026**