



## **COUNTRYWIDE PLC**

### **MODERN SLAVERY ACT 2015 STATEMENT**

#### **STATEMENT FOR THE FINANCIAL YEAR 2016**

##### **INTRODUCTION**

This statement is made on behalf of Countrywide plc pursuant to the section 54(1) of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement.

##### **OUR BUSINESS**

We manage the Group through four customer-centric business units:

- **Retail & London** – bringing our sales and lettings business together, defined in one business unit, recognising distinct characteristics of the London Market.
- **Financial Services** – clear and distinct mortgage, insurance and protection business.
- **B2B** – includes surveying, conveyancing, commercial and a unified Land & New Homes team.

##### **OUR SUPPLY CHAINS**

Our supply chains include: outplacement of IT services, plus outplacement of certain other routine administrative tasks that are commoditised in nature. Outplacement is to a mix of onshore and offshore providers.

##### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and in our supply chains.

##### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify risk and mitigate against such risks we nominate senior representations of the business units and functions, who in turn report to the Group Risk and Compliance Committee chaired by the Chief Group Risk Officer.

We have in place systems across our business; our trading partners; and our supply chains to:-

- Identify inappropriate employment practices.
- Identify and assess other potential risk areas.
- Mitigate the risk of slavery and human trafficking occurring.
- Monitor potential risk areas.
- Protect whistleblowers.

#### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we operate in line with principles of responsible sourcing, including paying employees at the prevailing minimum wage applicable within their relevant county of operations. We have in place a supply chain compliance programme that is maintained by the relevant account manager or relevant management. This consists of client reviews; audit; and self-certification declarations.

#### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, in our supply chains and in our business partners, we provide relevant training to our staff.

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 31<sup>st</sup> December 2016 and was approved by Countrywide plc's Executive Risk Committee on 8<sup>th</sup> February 2017.