



Modern Slavery Transparency Statement - 2018

Pinnacle Group

Introduction

The purpose of this statement is to confirm that Pinnacle Group Ltd and other relevant group companies¹ ("Pinnacle") have taken appropriate steps during the year ending 31st March 2018 to ensure our continued compliance with the Modern Slavery Act 2015. As a business we are committed to providing employment opportunities which are non-discriminatory, support living wage legislation, and offer regular hours and working conditions that are safe and hygienic.

Our Group

Pinnacle is a family of community-facing businesses providing comprehensive and integrated housing and neighbourhood services. Founded 25 years ago our origins are rooted in the delivery of housing services on behalf of local authorities and housing associations.

We currently manage a portfolio of 17,500 Council-owned homes as well as a growing portfolio of just under 10,000 of private rented homes across both public and private sectors. We also provide neighbourhood FM services to over 300,000 homes, more than 200 schools and a range of public open spaces across the UK.

Additionally, we deliver a range of neighbourhood-related services that support the sustainability of low-income communities including employment, skills and training services on behalf of Central Government, the design, build and operation of district heating networks and the installation and operation of our own hyper-fast broadband network.

We now directly employ nearly 2,700 people of more than 50 different nationalities, working from over 30 locations across England and Scotland. Our operations are delivered by six brands;

- Regen – investing in housing-led regeneration across the public and private sectors
- People – enabling people to find lasting employment and change their lives
- Power – building bespoke energy networks for new / existing developments
- PSG – supporting communities by providing integrated housing and facilities management solutions
- Places – delivering property management services in mixed-tenure communities
- Grain – supplying hyperfast fibre broadband to communities

Further information on our business can be found at: <http://www.pinnaclegroup.co.uk>.

Pinnacle is heavily reliant on its people and supply chains in the delivery of services. Each business within the group is responsible for ensuring that they can demonstrate compliance with the Modern Slavery Act by working to our Group policies and procedures.

¹ This statement covers all subsidiaries of the group, but particularly Pinnacle Group Ltd and Pinnacle Housing Ltd who both fall within the scope of section 54(2) of the Modern Slavery Act 2015.



Due diligence across our business and supply chain

Our business in relation to slavery and human trafficking

Pinnacle has a reputation for and prides itself on being a moral and principled employer. We believe this provides a platform to deliver a more consistent service and quality across our contracts and sends out a message that we care about the wellbeing of the people working for us.

All staff employed by Pinnacle have identity and Right to Work checks, reference checks, and where applicable DBS checks prior to employment commencing. For certain roles, where additional background checks are required a more in-depth vetting process is in place. In 2017 we introduced a new HR and Payroll system, which allowed us greater transparency and improved workflows over this process, therefore reducing any compliance risk. During 2018 we have further extended our DBS workflows and reporting to incorporate 3-yearly checks.

We are an accredited “Investor in People”. The accreditation requires the Group go through a rigorous assessment framework to ensure our policies, procedures, and the way we treat our staff sets a standard of a great employer, and an outstanding place to work. As part of this assessment we ask staff to complete a satisfaction survey.

Our supply chain in relation to slavery and human trafficking

We expect our suppliers to work to the same high standards that we impose on ourselves. We actively promote safe and fair working conditions, including the responsible management of environmental and social issues within our supply chain.

Through our procurement processes we monitor our supply chain to ensure only reputable suppliers and contractors who share those same high standards remain on our preferred supplier list.

As part of the new supplier process, all suppliers are required to complete various due diligence checks and return a signed copy of our Supplier Code of Conduct which they must comply with to remain a Pinnacle supplier. We assess our supply chain for potential areas of risk of non-compliance with the Act, considering a number of factors including:

- suppliers operating outside of the UK / EU regulatory framework;
- raw materials that are produced, or likely to be produced, outside of the UK / EU;
- suppliers operating using temporary and/or low skilled labour.

Within our standard commercial contracts, there is an obligation for suppliers to fully support and operate in accordance with the Act and take all reasonable steps to ensure that there is no modern slavery in its business or supply chain – Pinnacle reserve the right to terminate any supplier relationship where this obligation is not adhered to. Throughout 2018, we have continued to roll this out as new suppliers are brought on board, or where we renew terms with existing suppliers. Going forward, we will also look to carry out an audit of our major suppliers.

Effectiveness in ensuring that slavery is not taking place

Pinnacle has a set of policies and procedures which in general cover human rights issues and are aimed at minimising the risk of slavery or human trafficking. Our policies are reviewed on an annual basis, or more regularly as required by any legislative change.



Some of the policies and procedures of particular note are our Code of Conduct, Equal Opportunities statement, Diversity strategy, Recruitment and Selection, Grievance and Whistleblowing procedures.

Our staff, customers and suppliers are encouraged to report any concerns or suspicions they have that any unlawful conduct, including slavery or human trafficking, is taking place at work.

We also promote Unseen's Modern Slavery Helpline, where individuals can report any suspicious activity or seek help and advice in confidence.

Staff training about slavery and human trafficking

Our policies are communicated to staff from the point of induction and regular updates are provided as required either through training programmes or Corporate Communications as the Group see fit. All staff are provided with a copy of our Core HR policies and "The Pinnacle Way" handbook at induction.

Our policies and procedures are reviewed on an annual basis, or more frequently where legislation or regulation updates dictate, to ensure that they remain fit for purpose.

Over the next twelve months, we will continue to roll out training to our procurement and commercial teams to make them aware of the Act and our associated due diligence processes.

Our Commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Pinnacle's slavery and human trafficking statement for the financial year ending 31 March 2018 as approved by the Board of Directors.

A handwritten signature in black ink, appearing to read "Perry Lloyd".

Perry Lloyd
Group Chief Executive, Pinnacle Group Limited.

25 October 2018