



Modern Slavery Transparency Statement - 2020

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 2020 to ensure our continued compliance with the Modern Slavery Act 2015 (the “Act”). 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. We are also committed to implementing and enforcing effective systems and controls to ensure that there is no modern slavery or human trafficking taking place anywhere in our own business or in any of our supply chains.

Our Group

Pinnacle provides people-first, management and maintenance services across a select range of community-facing assets and infrastructure. Founded over 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 affordable homes as well as a portfolio of more than 6,500 mixed tenure and private rented homes across both public and private sectors. We also provide integrated FM services to over 460,000 homes, more than 200 schools, academies and universities, 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 over 2,800 people of more than 50 different nationalities, operating from over 100 locations across the UK. Our service infrastructure allows us to “localise” service delivery and be a part of the communities we serve.

We have five operating businesses:

- Homes – strengthening communities through the provision of tenure-blind management solutions;
- FM – putting the customer at the heart of facilities management services;
- People – transforming lives through employment, wellbeing and recruitment services;
- Power – creating bespoke energy networks for new developments and existing buildings; and
- Grain – delivering the latest and most advanced fibre broadband network in the UK.

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. We are also aware of our diverse customer base with a wide range of backgrounds and needs. Each

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.



business within the group is responsible for ensuring that they can demonstrate compliance with the Act by working to our Group policies and procedures.

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.

We support living wage requirements and regularly review our terms of employment to ensure that they comply with all relevant legislation.

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. In 2018 we further extended our DBS workflows and reporting to incorporate 3-yearly checks. A key area of focus towards financial year end 2020 and subsequently has been a review of our spend and policies on PPE. To that end we implemented a new Order Management System which enhanced our ability to make quick decisions and bring on new suppliers safely, whilst supporting our management of essential supplies throughout the COVID-19 crisis.

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 have zero tolerance 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 and comply with our values 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; and
- suppliers operating using temporary and/or low skilled labour.

Within our standard tender documents and 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. We have recently begun the process of identifying suppliers that should have their own modern slavery policy – we have reviewed 50 such policies to date.

In 2019, we integrated modern slavery obligations into our new supplier process and required suppliers – many of them long-standing suppliers of the group – to sign up to our Supplier Code of Conduct. At the time of writing, we now have over 470 suppliers signed up to adhere to our Code. We have also continued to roll out quarterly audits with our strategic suppliers where the management of environmental and social issues is addressed as an agenda item for discussion. This now forms part of a more detailed annual audit of major suppliers.

We are further introducing a supply chain management CRM system where we will be able to flag those suppliers that should have a modern slavery policy and will be carrying out audits to check their policies are in place, and fully implemented.

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.

In addition to our Modern Slavery Policy, some of the policies and procedures of particular note are our Supplier's Code of Conduct, Equal Opportunities statement, Diversity strategy, Recruitment and Selection, Grievance and Whistleblowing procedures. These are all easily available on our intranet.

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. For our staff, we have introduced a dedicated and confidential Report a Concern link on our intranet to facilitate this.

We also promote the Modern Slavery Helpline 0800 0121 700 (<https://www.modernslaveryhelpline.org/>), 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. In particular, we are working on updating our policies on safeguarding and vulnerability issues, mindful of our diverse customer base.

Over the next twelve months, we will continue to roll out training to our procurement, commercial and operational teams to increase their awareness 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 2020 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.

29 October 2020