

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2024

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (“the Act”) for the financial year ending 31 December 2024 and details the steps taken by the Spicerhaart group (“the Group”) to comply with the Act.

The Group includes Spicerhaart Group Limited, Spicerhaart Estate Agents Limited, Spicerhaart Residential Lettings Limited, Chewton Rose Limited, Butters John Bee Limited, BJB (Lettings) Limited, B C Holt Limited, Howards (Estate Agents) Limited, Just Mortgages Direct Limited, Valuation Limited and Spicerhaart Corporate Sales Limited.

The Group’s business consists of the provision of estate agency services, residential lettings services, mortgage and protections services, asset management services and other associated products and services under the haart, Felicity J Lord, Darlows, Haybrook, Chewton Rose, Butters John Bee, Howards, Just Mortgages and Valuation brands.

The Group is committed to taking reasonable and proportionate steps to ensure that slavery or human trafficking is not taking place in its business or those of its suppliers.

In respect of its own business, the Group believes that its business sector is not one which is subject to a high risk of slavery or human trafficking occurring. Nevertheless the Group does acknowledge that a degree of risk may exist and is therefore committed to taking steps to reduce such risk. Such steps include implementing and maintaining appropriate systems and controls.

With regard to its supply chain the Group utilises a risk based approach to identify those businesses and supply sectors where the risk of slavery or human trafficking occurring is increased and takes appropriate steps to satisfy itself that its suppliers meet their own commitments and obligations, including (where proportionate) reviewing suppliers’ own statements made pursuant to the Act, carrying out due diligence and liaising regularly with suppliers. Furthermore the Group has previously utilised and anticipates utilising again in the future the services of procurement consultants in relation to certain areas of its supply chain. The work of such consultants includes obtaining information and undertakings from prospective suppliers in relation to their compliance with the Act.

Furthermore the Group’s policies (most notably its Whistleblowing Policy) set out clearly the steps that an employee of the Group should take if they become aware of any matter which may constitute illegal or unethical conduct, including any potential breaches of the provisions of the Act.

This statement was approved by the Board of the Spicerhaart Group on 30<sup>th</sup> April 2025 and is signed by Paul Alick Smith

Signed.....  
  
Paul Alick Smith