



Orbit Modern Slavery and Human Trafficking Statement

2025/2026 Modern Slavery and Human Trafficking Statement
Financial Year Ending 2025/2026

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Introduction

Orbit is committed to making a positive difference to our customers, communities, and society. Central to this commitment is our responsibility to safeguard human rights and uphold the highest ethical standards across our operations and supply chains. We maintain a **zero-tolerance approach** to all forms of modern slavery and human trafficking.

This statement outlines the steps Orbit has taken during FY2025/2026 and the actions planned for FY2026/2027 to prevent modern slavery within our business and supply chains.

“Orbit maintains a zero-tolerance stance towards any manifestation of slavery or human trafficking.”

Our Structure and Operations

Orbit is a leading UK housing group with c1,385 colleagues, managing over 46,000 affordable and social rent homes and supporting more than 100,000 customers across the Midlands, South East, and East of England.

Orbit comprises one Group company and four subsidiaries, each with defined purposes, all overseen by a Common Board of Directors. Our activities are guided by our Sustainability Strategy and aligned with the UN Sustainable Development Goals.

Our Supply Chains

Orbit spent over £300m (inc. VAT) in FY2025/2026 procuring goods, services, and works. Our supply chain includes a diverse range of suppliers, from SMEs to multinational organisations, providing construction materials, civil engineering and groundworks, IT and AV equipment, decarbonisation services, recruitment and temporary labour, repairs maintenance and planned investment, waste and travel services.

The majority of our goods and services come from the UK, however some spend sits outside of the UK and we recognise that some categories carry higher risks of labour exploitation. All our contractual documentation ensures that suppliers entering into any new contracts with Orbit agree to comply with the Modern Slavery Act 2015 and confirm they already pay the living wage or have a plan in place to do so.

Our standard supplier contract terms also require our suppliers to maintain records to trace the supply chain of all goods and services which are provided to Orbit and where requested, they are able to demonstrate the steps they have taken to ensure human trafficking and slavery is not prevalent in any of its supply chains.

As part of our procurement processes, potential new suppliers bidding on our contracts are required to provide us with a copy of their own Modern Slavery and Human Trafficking Statement as part of the tender process.

Policies and Governance

Orbit has a comprehensive policy framework to prevent modern slavery, including:

- Procurement Policy and Procedure
- Orbit Code of Conduct
- Probity and Anti-Bribery Policy
- Whistleblowing Policy
- Standard Terms and Conditions of Purchase
- Sustainable Supplier Charter

Governance oversight is provided by:

Audit, Risk and Assurance Committee –principal oversight of modern slavery governance

Sustainability Steering Group – oversees delivery of the Sustainability Strategy

Common Board of Directors – responsible for Orbit's purpose, values, and commitments

Risk Assessment

Orbit assesses modern slavery risk using UK Government guidance, and we have risk assessed our supply chain to take into account key risk factors such as country of origin; sector, subcontracting and supply chain agreements.

High-risk categories for Orbit include:

- IT and AV equipment
- Construction materials
- Civil engineering and groundworks
- Recruitment agencies
- Waste and recycling services

Where a category is classed as higher risk, additional due diligence checks are undertaken.

Due Diligence and Supplier Management

Orbit undertakes proportionate due diligence to ensure suppliers meet our ethical standards. This includes:

- Mandatory compliance with the Modern Slavery Act 2015
- Review of supplier policies, codes of conduct, and ESG commitments
- Additional due-diligence questions for high-risk procurements

Actions Taken in FY2025/26

In FY2025/2026 Orbit continued its commitment to tackling modern slavery and human trafficking and strengthened its approach through:

Policy and Process Improvements

- Updated Procurement Policy (aligned with the Procurement Act 2023) which is being further updated in FY26/27
- Enhanced supply chain mapping
- Revised sourcing templates for medium and high-risk procurements

Supplier Engagement

- Increased supplier consolidation and use of approved frameworks where appropriate.
- Increased market engagement activity in early tender stages.
- Encouraged SME suppliers to complete action plans.

Risk-Specific Interventions

- IT/AV: review of OEM modern slavery and conflict minerals statements
- Recruitment: We completed a new procurement for our temporary recruitment services and ensured strict identity, right-to-work, and compliance checks as well as selecting a partner with strong controls regarding modern slavery.
- Travel: risk-based assessments and escalation processes in place

Training and Awareness

- Mandatory training for Procurement staff using UK Government modules.

Whistleblowing and Reporting

Orbit encourages colleagues to report any concerns regarding modern slavery or human trafficking risks along with any other potential safeguarding risks through:

- Line managers
- Whistleblowing Officer
- Senior managers
- Safecall (independent reporting service)

Posters and intranet resources ensure staff know how to raise concerns safely and confidentially.

Priorities for 2026/27

Orbit will continue to strengthen its approach by:

- Reviewing and implementing a new contract management framework which has modern slavery and sustainability considerations.
- Strengthening relationships across the board with suppliers and ensuring regular reporting.
- Enhancing training for procurement colleagues and making training available for front line colleagues on how to identify any modern slavery or human trafficking risks in our customer base.
- Continuing engagement with public sector procurement consortia to share best practice.
- Reviewing the opportunities for colleagues to identify any risk areas within our customer communities.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Orbit's Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2026.

Approved by the Common Board on 25/6/2026

Signed by

A handwritten signature in dark ink, appearing to read 'Phil Andrew', with a long horizontal stroke extending to the right.

Phil Andrew, Chief Executive Officer, Orbit Group Limited

Signed by

A handwritten signature in dark ink, appearing to read 'Stephen Jack', with a long horizontal stroke extending to the right.

Stephen Jack, Chair of Orbit Group Limited

