

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2025

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (“the Act”) for the financial year ending 31 December 2025 and details the steps taken by the Spicerhaart group (“the Group”) to comply with the Act.

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.

### The Group’s Structure

As at the date of this statement the Group includes Spicerhaart Group Limited, Spicerhaart Estate Agents Limited, Spicerhaart Residential Lettings Limited, Butters John Bee Limited, Howards (Estate Agents) Limited, Just Mortgages Direct Limited, Valuation Limited and Spicerhaart Corporate Sales Limited. In addition to the aforementioned companies during the financial year ending 31 December 2025 the Group included the following companies - Chewton Rose Limited, BJB (Lettings) Limited and B C Holt Limited (all of which were dissolved in March 2025 as part of a solvent restructuring exercise)

### The Group’s business

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 operates from approximately 140 customer facing offices / branches and a number of support offices, has approximately 2,100 staff (both employed and self-employed) and has a combined annual turnover of approximately £147m.

Companies within the Group are regulated by HMRC the FCA and the RICS and are members of The Property Ombudsman and Propertymark.

### Supply Chains

Types of suppliers with which the Group and its constituent companies work and contract with include (but are not limited to):

- suppliers of IT products, hardware and services;
- suppliers of telecom services and equipment;
- suppliers of services to the Group’s branch and office network (including suppliers of office equipment and furnishings, maintenance / branch fitting suppliers and cleaners); and
- suppliers of vehicles within and services to the vehicle fleet operated by the Group.

In addition those companies within the Group which provide letting and asset management services are often required to instruct contractors on behalf of their clients.



## Risk Assessment / Management & Due Diligence

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.

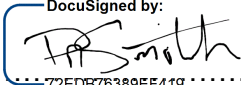
## Key Performance Indicators

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. The Group monitors any reports made by employees pursuant to its policies regarding potential breaches of the provisions of the Act.

## Training

The Group is currently undertaking a review of its training programme and procedures with a view to ensuring that all of its employees and staff members are able to recognise risk factors and warning signs of modern slavery and human trafficking and are fully cognisant of the Group's policies and procedures for reporting any concerns.

This statement was approved by the Board of the Spicerhaart Group on 16<sup>th</sup> June 2026 and is signed by Paul Alick Smith

Signed    
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 Paul Alick Smith