

Human Trafficking and Modern Slavery Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Countrywide has taken, and continues to take, to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Modern Slavery Statement

Countrywide Grounds Maintenance Limited (Countrywide) adopts a zero-tolerance policy to Modern Slavery (which, for the purposes of this Statement, includes human trafficking and forced labour) and fully supports the objectives of the Modern Slavery Act 2015. Modern Slavery is a contravention of basic human rights in complete variance to the Code of Values (the Code) adhered to by Countrywide.

The Code is intrinsic to Countrywide's approach to all business activities and forms the basis of its operating ethos. It provides guidance to employees in conducting their roles generally and regarding recruitment and procurement. It is fundamental to the Code that all operations are "Above the line" and employees and franchisees communicate "honestly and with purpose". Adherence to the Code is an agenda item during performance reviews, ensuring it remains at the forefront of all individual, as well as company, undertakings.

Countrywide is committed to removing all forms of Modern Slavery in its business and supply chain so it operates in a fair and ethical manner with integrity. Countrywide acknowledges that to achieve its aims it must follow an ongoing process of vigilance and action to bring about improvements. Countrywide is committed to the implementation of effective procedures to safeguard against Modern Slavery. This includes, but is not limited to, identifying areas of risk and implementing appropriate controls.

Countrywide employees can access an Ethics Hotline to report any concerns regarding potential unlawful or unethical conduct, including Modern Slavery, within the business. There is also a Whistleblowing and Disclosure Policy so employees have a framework within which to raise concerns about practices within the business or supply chain.

Countrywide's Structure

Countrywide provides ground maintenance services, tree works, landscaping and winter services throughout Great Britain to commercial operations and public bodies. It is a member of Neighbourly Brands and its ultimate parent company is the US business Dwyer Franchising LLC d/b/a Neighborly.

Countrywide contracts with its customers directly and services are delivered on a sub-contract basis through a locally based network of franchisees operating subject to, and in accordance with, a Franchise Agreement (the Agreement) and the Countrywide Operations Manual (the Manual).

Countrywide's Supply Chains and Due Diligence

Countrywide's supply chain falls into two parts (a) suppliers related to the creation and support of the Head Office infrastructure and (b) the franchisee network.

Infrastructure

Examples of infrastructure suppliers include IT equipment, contractors for services such as marketing, computing and communication services, cleaning and waste disposal. Some services are sourced by Countrywide itself, but the majority are sourced by Neighbourly Brands and are common to other group businesses located in the shared Head Office location.

Infrastructure Due Diligence

Countrywide, and Neighbourly Brands, seek to build and develop enduring relations with suppliers and clearly set out expectations regarding business conduct. Before embarking on a relationship with a supplier, checks are undertaken regarding it in terms of whether it supplies any other Neighbourly companies and their experiences, credit checks, review of Companies House filings, media reports and the supplier's own statements (where available) relating to the measures they have undertaken to ensure Modern Slavery is not present in their business or supply chain. It seeks to appoint established suppliers with strong credentials. If non-UK suppliers are to be used, these entities are required to demonstrate they have appropriate anti-slavery policies in force. It is not believed that the Infrastructure supply chain carries a high risk relating to Modern Slavery.

The Franchise Network

All franchisees operate under the legally binding Agreement. This requires them to fully comply with all aspects of UK legislation. Termination rights exist if franchisees fail to comply with this obligation. Guidance is given in the Manual regarding recruitment procedures including but not limited to establishing a potential employee's right to work in the UK. Franchisees are expected to act honestly and professionally in all their dealings and abide by the Code.

Franchisee Due Diligence

Before a franchisee is appointed a rigorous recruitment process is undertaken which includes several in person interviews, including a meeting with the Managing Director, the gathering of documentary evidence to establish identity and UK immigration status, financial and credit checks and a Disclosure and Disbarring Service check. Following this, and if successful, a comprehensive training programme is undertaken. During the operation of the franchise, regular visits are made by Countrywide to view franchisee's operations and all accounts are analysed. There is a potential risk within the franchise base but this is reduced by the pre and post induction checks, training and obligations

within the Agreement. The risk that franchisees employ people on terms less than that required by law is mitigated by the demand for the type of workers required being high and suitable candidates being limited meaning market forces ensure the wages paid are competitive.

Training and Employment

Countrywide does not currently have specific training on the Modern Slavery Act 2025 in place. Employees however have access to a broad range of online learning courses covering Ethics and the Code of Conduct, Global Anti-Bribery and Corruption and Global Workplace Harassment which they are pro-actively encouraged to participate in. Details of the Whistleblowing and Disclosure Policy and Ethics Hotline (which allows anonymous reporting) are within the Employee Handbook provided to all new joiners at induction and readily accessible via the UK Intranet. Any reports made via either of these are regarded seriously, referred to the Managing Director, Legal Department and, if applicable, the HR Department for investigation and action.

The Equal Opportunities and Diversity Policy clearly states Countrywide will not tolerate any abuse of human rights within its organisation. All new employees are assessed in accordance with sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006 to ensure they have the right to work in the UK prior to commencement of employment to safeguard against human trafficking. The verified documents obtained in the right to work checks are retained for the duration of the employee's employment and for two years thereafter. The original documents checked include passport, visas, Home Office documentation (if applicable) and full birth, adoption or naturalisation certification.

The Human Resources Department works to ensure Countrywide is compliant with legislation including but not limited to the minimum wage, working time directive, paid holiday entitlement and that they operate in a safe and hygienic working environment.

Future Objectives

Countrywide has identified the following areas for focus and ongoing improvement in the next financial year:

- Continuous review of the Modern Slavery Policy to ensure effective communication of Countrywide's values and standards.
- To review future supplier contracts to ascertain if they contain an obligation for the supplier to be contractually bound by the Modern Slavery Act 2015.

In accordance with the requirements of the Modern Slavery Act 2015, this statement can be found on our website and will be reviewed annually.