

## Tilia Homes Limited (Tilia Homes)

### Modern Slavery Act 2015 Statement - 2023

#### Introduction

Tilia Homes is a UK housing development company. We have relationships with a large number of subcontractors and, every day, a significant number of their employees will be working on our sites, in addition to our own employees. We also rely on a number of manufacturers and suppliers which, in turn, will source products from their respective supply chains.

#### Our policies

We have a number of policies which are designed to manage the risks relating to modern slavery and human trafficking, including our Code of Conduct, Anti- Slavery and Human Trafficking Policy and Whistleblowing Policy.

These policies confirm our 'zero tolerance' approach to modern slavery and human trafficking in our business and supply-chain. We are committed to acting ethically and with integrity and to maintaining systems and controls which are designed to prevent modern slavery and human trafficking from taking place in our business or across our supply-chain. Our Whistleblowing Policy provides a mechanism for our employees and others working in our supply-chain to report suspected breaches of these policies.

The risks relating to modern slavery and human trafficking can apply anywhere in our operations., We expect our suppliers and sub-contractors to ensure that there is no slavery or human trafficking in their own supply-chains. If issues are identified (including through our audit process) which are not resolved to our satisfaction, we review the relationship with the relevant organisation and take remedial action, as appropriate.

#### Our approach to assessing and managing the risk modern slavery and human trafficking

1. We have a company-wide policy confirming our 'zero tolerance' approach to modern slavery and human trafficking.
2. We require our sub-contractors and suppliers to acknowledge their responsibility for complying with all legislation relating to modern slavery and human trafficking, as updated or replaced from time to time.
3. We undertake periodic risk assessments to identify the key modern slavery and human trafficking risks in our business and supply chain.
4. Our contractual terms include obligations on our sub-contractors and suppliers (and in turn their agents, employees and sub-contractors) to comply with all legislation relating to modern slavery and human trafficking, as updated or replaced from time to time..
5. Our policies require our sub-contractors to complete an assessment to confirm that they comply with Tilia Homes' approach to modern slavery and human trafficking.  
We have worked with three leading accreditation companies in the UK (namely, ChAS, Constructionline and CQMS) to develop the common standards applicable to our sub-contractors.
6. We undertake checks on new recruits to ensure that they are eligible to work in the relevant country of employment.
7. We continue to deliver training to employees about modern slavery and human trafficking and how to take steps to prevent it.
8. We monitor, through Tilia Homes' internal, standalone compliance policies and procedures, the implementation of our policies, training and procedures which relate to modern slavery and human trafficking. This includes mandatory training for new joiners, of which rates of completion are monitored monthly, and failure to complete within a deadline is a disciplinary matter.

## Next steps

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking. Next steps will include:

1. Under our Compliance Framework, keeping under review our Anti-Slavery and Human Trafficking Policy (and related policies) and the related procurement standards.
2. Continuing to assess the risks of modern slavery and human trafficking in our business and our supply chain.
3. Regularly assessing our pre-qualification standards for the appointment of new suppliers and subcontractors. In particular, asking suppliers to complete an assessment to confirm that they comply with all legislation relating to modern slavery and human trafficking, as updated or replaced from time to time.;
4. Through Tilia Homes' newly formed risk register, assessing key modern slavery and human trafficking risks in the business and supply chain, and taking necessary steps to mitigate the risk.
5. Reserving the right to audit certain key supply-chain partners to assess their controls.
6. Reviewing and updating our programme to identify and manage any modern slavery and human trafficking risks associated with high-risk goods and services.
7. Keeping under review the due diligence procedures for our supply-chain, which apply both prior to appointment and thereafter.
8. Auditing key providers of temporary labour.
9. Providing up to date training to our employees on identifying potential modern slavery or human trafficking within our operations and supply chain.
10. Monitoring the effectiveness of steps taken by Tilia Homes to ensure modern slavery and human trafficking is not taking place, by setting performance indicators as it deems appropriate (e.g., percentage of suppliers vetted for adequate practices; number of suppliers screened; and inspections of sub-contractors).

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Tilia Homes' modern slavery and human trafficking statement for the financial year ended 31 March 2023. It was approved by Tilia Homes' board of directors on 3 October 2023.

Signed on behalf of the board of directors of Tilia Homes by:



Group Managing Director  
Tilia Homes Limited