

Modern Slavery & Human Trafficking Policy Statement

Financial Year 2018-2019

(Modern Slavery Act 2015)

Introduction

Scotia Homes Ltd is committed to ensuring the highest ethical standards across its entire business operation, including compliance with both the spirit and letter of the Modern Slavery Act 2015. We take a zero tolerance approach to any form of modern slavery, including human trafficking and forced labour throughout our supply chain and at any location where we work. This applies to all employees and all contractors that we engage.

Responsibilities

The Managing Director and Board of Directors are responsible for reviewing and maintaining this Policy in pursuance of compliance with the 'Act'. The Policy is published on our Company website and will be reviewed at least annually, in line with the Company's integrated management system. Line management have a direct responsibility for supply chain management commensurate with their role and function.

Our Business

We are an established premium medium sized property developer and housebuilder operating in Scotland, where we have operated since 1990 creating desirable homes and great places. We employ circa 210 direct employees, we also have a diverse sub-contractor labour force (supporting over 250 sub-contractor companies) including ground workers and housebuilding trades.

Supply Chain Management

We are an accredited ISO 9001 and ISO 45001 Company and have effective systems at the heart of our business. Our robust processes for evaluating, approving and engaging suppliers and contractors require that they aspire to and meet similarly high standards to our own. We have longstanding relationships with most of our suppliers and contractors, and have over time, built high levels of trust and respect leading to a culture where any kind of ill treatment of workers would immediately stand out as unacceptable and would be challenged.

Policies

Our company vision statement and our integrated management system, including Human Resource policies, articulate our commitment to ethical best practice, corporate social responsibility and business sustainability based upon care for our people.

Training & Awareness

Internal training and communications to raise awareness of modern slavery etc is undertaken, helping management and workers to recognise when things do not appear to be right. The open culture within the Company promotes quick reporting of any concerns.

Due Diligence & Assessment of Risk

Regular ongoing reviews of supplier and contractor performance is undertaken, including their attitudes towards their workers. This is a requirement of our integrated management system. We strive to work only with others that share our values, and who actively pursue high standards of occupational safety & health and help protect our environment.

Our current assessment of the risk level from modern slavery etc is LOW, based upon our historical knowledge of our supply chain, longstanding good relationships and our open and honest culture. The risk level is reviewed annually by the Board.

Improvement Objectives

We will, as part of our annual management review of our system and process take all reasonable measures to ensure that our defences against modern slavery etc continue to reflect industry best practice. Where necessary specific improvement objectives will be set.

Specifically, we are currently reviewing and amending contractual agreements to ensure that compliance with the 'Act' by our suppliers and contractors is explicit.

This policy is approved by the Board of Directors and signed by Martin Bruce, Managing Director.

Martin Bruce

Managing Director

Date: 14th February 2019

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