

# Modern Slavery & Human Trafficking Policy Statement

## Year End June 2023

(Modern Slavery Act 2015)

### Introduction

Scotia Homes is committed to ensuring that its ethical standards are aligned to best practice across its entire business operation, including compliance with both the spirit and letter of the Modern Slavery Act 2015, the 'Act'. 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 medium sized property developer and housebuilder operating in Scotland, where we have operated since 1990 creating desirable homes and great places. We employ up to 200 direct employees, we also have a diverse sub-contractor labour force (with up to 250 sub-contractors) including ground workers and housebuilding trades.

### Supply Chain Management

We are an accredited ISO 9001 (Quality), ISO 45001 (Occupational Health & Safety) and ISO 14001 (Environmental management) company and have effective systems at the heart of our business. Our robust processes for evaluating, approving and engaging suppliers and contractors enables an assessment of compliance. Furthermore, our longstanding relationships with most of our suppliers and contractors, over time, has 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 will be 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 systems and processes, take 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 Richard Begbie and Graham Reid, Joint Managing Directors.**

A handwritten signature in black ink, appearing to read 'Richard Begbie & Graham Reid', written in a cursive style.

**Richard Begbie & Graham Reid**

Joint Managing Directors

Date: 25<sup>th</sup> October 2023