

## Anti-Slavery and Human Trafficking Policy

### Summary / Background

The Modern Slavery Act 2015 was introduced to address instances of slavery and trafficking in the UK. The legislation significantly enhances law enforcement powers and the level of support and protection for victims.

Modern slavery is a crime and a violation of an individual's human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in within the businesses making up Tilia Homes or across our supply chain (for the purpose of this policy, this includes our sub-contractors, suppliers, and other contractors/agents providing services to Tilia Homes). Accordingly, this policy is also applicable to our supply chain.

### What is the requirement?

All Tilia Homes employees and supply chain are required to follow the systems and controls that are designed to ensure that modern slavery has no place in our business. Where our standards fall short of our expectations or where you have a concern, you must report those concerns (see Chief Executive foreword for more details).

To enable Tilia Homes to meet its commitment to ensuring modern slavery does not take place in our business, you are required to understand the forms of modern slavery and the indicators of modern slavery.

### Why is it important?

The impact of modern slavery can be severe for the victims of this crime. As a responsible business Tilia Homes is committed to ensuring that it has systems and controls in place to prevent modern slavery from taking place in our business or across our supply chain. The way we operate our business is set out in our Code of Conduct – this is underpinned by the principle of doing the right thing. Modern slavery is a criminal offence and can carry a prison sentence of up to life imprisonment.

### What must I do/not do?

In applying this policy, we must consider our own actions and behaviours as well as those of our colleagues and those working within our supply chain.

We will:

- familiarise and comply with this policy;
- remain alert to any possible instances of modern slavery across our business or supply chain;
- communicate our zero-tolerance approach to modern slavery and share this policy to our supply chain at the outset of our business relationship with them and at appropriate intervals thereafter;
- ensure we follow our procurement standards;
- carry out appropriate due diligence;
- request that our sub-contractors and suppliers complete a modern slavery assessment;
- ensure that all our employees and eligible to work in the UK and check 'Right to work' documents where we are responsible for it;
- ensure all our employees are paid at least the minimum wage;
- provide training as appropriate; and
- report any known breaches or suspicions of a breach of this policy to the Companies head of Legal.

Our supply chain partners must hold their own suppliers to the same high standards. If the standards that we expect

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are not met, we may review whether the business relationship is continued. If you know or suspect modern slavery in any of our supply chain, you must not relinquish responsibility for reporting the matter to that particular partner – all instances of potential modern slavery must be reported to the Companies Head of Legal.

**This policy must be read in conjunction with the Chief Executive Foreword**

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