

## MILLER HOMES MODERN SLAVERY STATEMENT 2022

### Introduction

This statement is published in accordance with the Modern Slavery Act 2015 (the “Act”) and made on behalf of Miller Homes Limited and all holding companies and subsidiaries and constitutes our slavery and human trafficking statement published in accordance with Section 54 of the Act.

### About our Business

Miller Homes is a national house builder headquartered in Scotland with ten regional offices located in the UK. Our business involves buying land, obtaining planning consents, designing, building and selling residential properties within Scotland and England.

The company directly employs approximately 1130 people with on average 3900 sub-contractors and suppliers visiting our sites daily. The vast majority of our onsite construction work is carried out through sub-contractors. The materials we use to build homes are sourced from external suppliers, the vast majority of which originate in the UK. Our operations mean that we have no direct contact with countries that are generally regarded as being the most likely to have a risk of modern slavery and/or human trafficking.

Miller Homes recognises its responsibility to prevent forced labour and human trafficking in all its forms within its business operations and supply chains. We are committed to trading responsibly and ethically and respecting human rights.

### Our Policies and Due Diligence

We are committed as a company to tackling modern slavery and human trafficking and to work with suppliers and sub-contractors who share this commitment. This statement is supported by our Code of Ethics, Anti-Bribery and Corruption Policy and Code of Conduct for Suppliers. We have made a commitment to The Living Wage Foundation to ensure all our employees are paid the Real Living Wage which is above the National Living Wage. We strive to be an employer of choice and to provide good working conditions and a fair working environment for all our employees. Regular training is provided to employees in respect of our policies and procedures to ensure compliance and good governance. Our Equalities Policy states that all employees will be treated fairly and with respect.

All of our suppliers are required to comply with our Code of Conduct - Working Together. Our Code sets out the minimum standards of compliance we expect from our suppliers, with guidance on how we expect these standards to be achieved. It covers both legal and ethical practices and policies. We have reviewed and updated our Code of Conduct for Suppliers to specifically include obligations on our suppliers to evidence compliance with the Act.

For sub-contractors, we have set out our requirements on Modern Slavery in the terms and conditions which are issued to our sub-contractors

## **Risk Assessment**

We have carried out a risk assessment of our national suppliers and concluded that there is a high level of compliance with the Act. The review determined the level of awareness of the Act and the policies of those suppliers. We expect our suppliers to demonstrate their adoption and compliance with the Act and we will continue to work with suppliers to ensure standards are achieved and maintained.

## **Whistleblowing**

The Company has a whistleblowing policy and management are required to investigate and, where necessary, take appropriate action on any concerns expressed. The Company also operates a third party whistleblowing hot line to allow anonymous reporting.

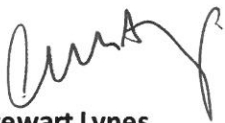
We have had no incidences of whistleblowing regarding modern slavery in the reporting year.

## **Training and Awareness**

We have:

- ensured so far as we can that our sub-contractors meet our standards of compliance with the Act when tendering for new business by informing them of our requirements and standards;
- updated our vendor assessments for our Suppliers to include specific questions on Modern Slavery;
- updated our induction procedures to include training on the Act; and
- reviewed our policies and procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers, to new and existing sub-contractors, and in relation to our own operations.

This statement has been approved by the board of directors of Miller Homes Limited and its ultimate holding company, Castle Builder Topco Limited, and is signed by the Chief Executive.



**Stewart Lynes**  
**Chief Executive Officer**  
**October 2022**