

## MILLER HOMES MODERN SLAVERY STATEMENT 2018

### INTRODUCTION

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

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.

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

The company directly employs approximately 850 people with on average 3500 sub-contractors and suppliers visiting our sites on a daily basis. 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, all of whom are located 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.

We are committed as a Company to tackling modern slavery and human trafficking and want 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. All employees are required to be aware of modern slavery and to report concerns and management are required to investigate and, where necessary, take appropriate action on any concerns expressed. The Company has a whistleblowing policy and operates a third party whistleblowing hot line to allow anonymous reporting.

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. During 2017, we reviewed and updated our Code of Conduct for Suppliers to specifically include obligations on our suppliers to evidence compliance with the Modern Slavery legislation. We have carried out a risk assessment of our national suppliers and concluded that there is a high level of compliance with the Modern Slavery Act. The review determined the level of awareness of the Modern Slavery Act and the policies of those suppliers. We expect our suppliers and sub-contractors to demonstrate their adoption and compliance with modern slavery legislation and we will continue to work with suppliers and sub-contractors to ensure standards are achieved and maintained. This year we will invite our major sub-contractors to comply with a similar Code of Conduct.

We have raised awareness of modern slavery within our business and, in particular, with those who are involved directly with sourcing of people and goods. The purpose of this is to establish the best way of incorporating our policy on modern slavery into the selection, due diligence and tender processes in our business. In addition, we will consider providing support where necessary for any suppliers who do not meet our required standards. We will ensure our policies and procedures are fair and responsible to ensure that our suppliers and contractors do not face unreasonable demands in meeting their obligations.

Our employees are paid at a level not less than The Living Wage which is a commitment made with The Living Wage Foundation. We strive to be an employer of choice and provide good working conditions and a fair working environment for all of 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.

We have considered our practice of using agency staff in certain areas of our operation and concluded that there is a potential, albeit low, risk of exposure to modern slavery. This financial year our diligence

will focus on the use of indirect labour through agency contracts to assess the risk in detail and work with agencies to promote good working practices, policies and procedures.

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

A handwritten signature in blue ink, appearing to read "Chris Endors".

**Chris Endors**

Chief Executive