

## MILLER HOMES MODERN SLAVERY STATEMENT 2026

### Introduction

This statement is published in accordance with the Modern Slavery Act 2015 (the “Act”) and is made on behalf of behalf of Miller Homes Limited and all holding companies and subsidiaries (including Miller Homes Limited and Walker Timber Limited). It constitutes the slavery and human trafficking statement of those companies for the financial year ended 31 December 2025, published in accordance with section 54 of the Act.

### About our Business

Miller Homes Limited is a national house builder headquartered in Scotland with eleven regional offices located in the UK. Its business involves buying land, obtaining planning consents, designing, building and selling residential properties within Scotland, England and Wales. Walker Timber Limited supports the group’s operations through the manufacture and supply of timber frame solutions.

Together, these businesses directly employ over 1,500 people, with around 5,000 sub-contractors and suppliers visiting Miller Homes sites on average each day. The vast majority of onsite construction work is carried out through sub-contractors, with materials and components sourced from external suppliers, other than timber frame kits manufactured by Walker Timber. While the Group has some exposure to overseas supply chains, the majority of its supply chain activity remains UK-based.

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 working with suppliers and sub-contractors who share this commitment. This statement is supported by our 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 recognise that, while the majority of our operations and supply chain are UK-based, the construction sector can still be exposed to modern slavery risks, particularly through labour supply chains, subcontracting arrangements and agency labour.

During the year, we reviewed risk areas within our operations and supply chain and began developing a more structured risk assessment process to support ongoing identification, assessment and management of modern

slavery risk. This work will continue to evolve as we continue to embed modern slavery considerations more fully into procurement and operational decision-making.

### **Whistleblowing**

The Company has a whistleblowing policy and management are required to investigate and, where necessary, take appropriate action on any concerns raised. The Company also operates a third-party whistleblowing hotline to allow anonymous reporting. We are continuing to review how our whistleblowing and reporting arrangements support the identification and escalation of modern slavery concerns, including ensuring there are clear routes for concerns to be raised and responded to appropriately.

We have had no reported incidents of modern slavery through our whistleblowing channels during the reporting year.

### **Training and Awareness**

We continue to strengthen awareness and capability across the business by:

- setting out our requirements and standards for sub-contractors when tendering for new business;
- including specific modern slavery questions in supplier assessment processes;
- including awareness of the Act in induction materials;
- delivering targeted training and workshops with support from the Supply Chain Sustainability School; and
- continuing to review policies and procedures to help identify, prevent and mitigate risks in our operations and supply chain

### **Strengthening our approach**

During the year, we strengthened our approach by reviewing policies and procedures through a modern slavery lens, developing escalation process for implementation in the coming year and considering how modern slavery risks can be addressed more clearly throughout the business. During the coming year, we will build on this work by implementing a dedicated modern slavery policy and escalation process, strengthening our risk assessment methodology, increasing role-specific training and awareness, and embedding modern slavery considerations more fully into supplier engagement, procurement processes and site-based communications.

We view our approach to tackling modern slavery as an evolving process and will continue to refine our practices in line with emerging risks, best practice and regulatory expectations.

This statement has been approved by the board of directors of Miller Homes Limited, Walker Timber Limited and the Group's ultimate holding company, Castle Builder Topco Limited

**Stewart Lynes**  
**Chief Executive Officer**  
**June 2026**