

Galliard Group Limited

Modern Slavery and Human Trafficking Statement

This Statement is made by the Directors of Galliard Group Limited pursuant to Section 54 of the Modern Slavery Act 2015

Introduction

Galliard Group Limited and all its subsidiary companies (the “**Organisation**”) is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking. This statement outlines our procedures for evaluating and assessing potential risk in order to ensure that our business does not engage in or endorse modern slavery or human trafficking.

Organisational structure and supply chains

This statement covers the activities of the Organisation.

- The Organisation is one of London’s largest private residential property developer, employing approximately 260 people across London and the Home Counties. For the year ending 31 March 2025, the Organisation had an annual turnover of circa £248.8m.

Countries of operation and supply

The Organisation currently operates in the following continents/countries:

- United Kingdom
- The European Union
 - France
 - Italy
 - Ireland
 - Netherlands
 - Poland
 - Portugal
 - Spain
- Asia –
 - China
 - Lebanon
 - Turkey
 - United Arab Emirates
 - Vietnam
 - Hong Kong
- United States

Of the countries listed above, aside from the United Kingdom, the countries with which the Organisation has its most regular dealings are:

- China
- Ireland
- Italy
- Spain
- Turkey
- Hong Kong

Of the countries listed above, the countries which the Organisation considers are potentially high risk in relation to modern slavery and/or human trafficking are:

- China
- Lebanon
- Turkey
- United Arab Emirates
- Vietnam

The following is the process by which the Organisation assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Highlight which countries/territories in which the Organisation has suppliers/supply chains are most at risk in relation to modern slavery and/or human trafficking (the Organisation has identified these territories within this Policy, above).
- Countries which are within the European Union, and other western countries such as the USA are deemed to be low-risk countries.
- Particular attention will be given to countries with a known poor record on human rights or labour conditions when deciding whether or not to engage with such suppliers.

A decision will then be taken by the Directors based upon intelligence gathered pursuant to the process above. Any supplier or potential supplier from a high-risk territory who is not able to demonstrate that it has taken/is taking measures to minimise slavery and human trafficking will be required to demonstrate that such steps have been taken prior to the Organisation engaging with such a supplier.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Procurement of building supplies from high-risk territories. Risk of non-adherence to labour laws and breach of environmental laws by suppliers.
- Procurement of natural resources (timber etc.) from high-risk territories.
- Use of 'gangmasters' to provide labour on construction sites.

Responsibility

Responsibility for the Organisation's anti-slavery initiatives is as follows:

- **Policies:** HR Director, Group Managing Director and Legal Director
- **Risk assessments:** Chief Executive, HR Director, Group Managing Director and Legal Director
- **Investigations/due diligence:**
 - David Hirschfield, Group Managing Director and Legal Director
 - Keisha Serieux, HR Director
 - Amanda Dijk, Chief Finance Officer
 - Les Drake, Chief Material Buyer
 - Greg Crowhurst, Head of Sub-Contract Procurement
- **Training:** Online training is delivered Group-wide on a regular basis and new starters are captured upon joining.

Relevant policies

The Organisation operates the following policies that describe both its approach to the identification of modern slavery risks and also steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** The Organisation encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Organisation's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact their line manager, the HR Department or the CEO.
- **Anti-Bribery & Corruption policy:** The Organisation's policy makes clear to employees the actions and behaviour expected of them when representing the Organisation. The Organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Procurement Policy:** The Organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Organisation works in partnership with suppliers to ensure that they meet the standards of the policy. Failure to observe the terms and conditions of the Procurement Policy may result in the termination of the business relationship.
- **Recruitment policy:** The Organisation uses only specified, reputable employment agencies who meet the criteria defined by our preferred supplier list to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Employment Contracts:** The Organisation's employment contracts clearly state that the Organisation has a strict anti-bribery and corruption policy in line with the Bribery Act 2010, which all employees agree to adhere to. The Organisation's employment contracts also make clear employees' leave entitlement, which is in excess of the statutory minimum requirement. Employment contracts also state employees'

probationary periods and make clear that at the end of such probationary period, employees will be eligible to join the Organisation's pension and healthcare schemes, both of which offer generous packages to employees which comply with the relevant statutory provisions.

Due diligence

The Organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Organisation's due diligence and reviews include:

- Implementing the introduction of a modern slavery questionnaire to be provided to all suppliers, requiring all suppliers to confirm that they are not engaged in the practice of modern slavery and/or human trafficking and that they have taken reasonable steps to minimise the risk of the same within their own supply chains;
- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the Organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- the intention of creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The Organisation regularly reviews its key performance indicators in line with business objectives. As a result, the Organisation is committed, as follows:

- to ensure all employees deemed relevant complete training on modern slavery on an annual basis
- to maintain a robust supply chain verification process, whereby the Organisation evaluates potential suppliers before they enter the supply chain; and
- to regularly review its existing supply chains and suppliers.

Training

The Organisation requires all employees within the Organisation to complete training on modern slavery.

The Organisation's modern slavery training is delivered as an online module and will demonstrate the following to our employees:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger Together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Organisation's supply chains.

Awareness-raising programme

As well as training employees, the Organisation commits to raising awareness of modern slavery issues by circulating a series of emails to all employees and using a poster campaign.

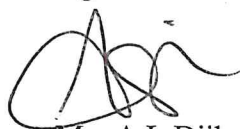
The campaign will explain to employees:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Board/Member approval

This statement has been approved by the organisation's Board of Directors who will review and update it annually.

Signed on behalf of the Board of Directors:



Mrs A L Dijk
Chief Financial Officer