



MODERN SLAVERY STATEMENT 2025

Introduction

This statement confirms the commitment of the Grampian Group (“Grampian”) to recognising and mitigating risks of modern slavery in its business activities and within its supply chains. The following statement outlines the measures we have implemented to ensure compliance with the Modern Slavery Act 2015, highlighting our commitment to ethical business practice and applies to the following organisations which form Grampian:

- Grampian Housing Association Ltd
- TLC Housing Maintenance Limited
- Kirkgate Developments Limited
- Kirkgate Homes Limited (currently dormant)

As a business we continually review and update our policies and practices to ensure that we have the most effective responses to modern slavery risk.

The following statement sets out:

- Our business structure
- Our risk assessment
- Due diligence processes
- Recruitment and procurement policies
- Training on modern slavery
- How we measure effectiveness

Grampian is opposed to all forms of modern slavery and is committed to acting ethically and with integrity in all its business relationships. This statement outlines the steps Grampian takes to ensure that adequate processes and controls are in place to ensure slavery and human trafficking is not taking place anywhere in our supply chains or in any part of our business.

Business Structure

Grampian owns and manages over 4,000 homes across the north east of Scotland. We employ over 120 colleagues, who support the provision of affordable, good quality homes and services to a significant number of customers and households.

As an organisation, we put the wellbeing of our customers and colleagues at the centre of what we do. We have therefore put the following measures in place to ensure we respond effectively to modern slavery risks that may arise.

Risk assessment

We recognise that some of the most vulnerable groups in the UK include migrant workers, asylum seekers and people with learning disabilities. Awareness of these vulnerable groups

and sectors will allow us to employ modern slavery due diligence throughout our internal business practices and our wider supply chains.

Due diligence processes

Grampian has adopted a set of values which serve as reference points for how we conduct our business and how we treat all our stakeholders. These values are:

Respect | Integrity | Commitment | Empathy

It is important to us that we employ ethical business practices that are aligned with our mission and core values. Procurement and recruitment are two of the key areas of the business which hold large responsibility for mitigating modern slavery risk, and below we have outlined some of our policies and procedures for mitigating risk in these departments.

Our policies

Recruitment

As an employer, we are committed to paying at least the Real Living Wage and we regularly review our terms of employment to ensure that they comply with all relevant legislation. During the recruitment process, we conduct thorough checks to ensure that our colleagues have the relevant documentation and have the right to work in the UK.

Grampian strives to treat every individual with dignity through robust HR policies. There are mechanisms in place for colleagues to access support if they are experiencing any type of abuse once in our employment.

Employment

Grampian strives to create a work environment where all colleagues feel safe, respected, and secure. We have established a Whistleblowing Policy to ensure that anyone can report a concern. We also have a Safeguarding Policy, procedure, and reporting system in place so that colleagues can identify and report issues efficiently and effectively. Through our safeguarding training module, colleagues are taught about the types of issues that may arise and how to identify them, and then how to report these issues. This training ensures that colleagues are confident in their ability to report safeguarding concerns and gives them reassurance that these concerns will be dealt with effectively.

We have an equality policy which sets out a framework of objectives and specific equality procedures that we use to address discrimination as well as to promote social justice.

The policy objectives are implemented through an equality action plan and a range of other equality procedures. This ensures that we adopt a holistic and systemic approach to equality rights implementation.

This framework provides the foundation on which we will deliver services and take positive action to address inequality and incidence of modern slavery.

Procurement and Supply Chains

Our procurement team is dedicated to acting ethically, engaging with the issue of modern slavery from the outset of the procurement process. Through a risk-based approach, the procurement team acts with integrity in all its business relationships. We work to identify high

risk activities from the outset, implementing systems and controls that seek to ensure slavery and human trafficking is not happening anywhere within our supply chains.

We consider the entire supply chain when it comes to ethics, not just our own. Our tender award criteria requires new suppliers to declare that neither they nor their supply chain are involved in modern slavery and have not been subject to any investigation in connection with an offence involving human slavery or trafficking. We continue to add provisions to our template contract documentation requiring our suppliers to provide evidence of actions they are taking to ensure there is no human slavery in their supply chains. Any evidence of non-compliance to the Modern Slavery Act 2015 is investigated and remedial action is taken.

Our contracts set out how buyers and suppliers should behave in respect of identifying and acting on any suspected instances of modern slavery. Contract management ensures that our suppliers are demonstrating good, ethical practice.

Lettings

When signing up new tenants we undertake a robust process to ensure that they are who they say they are which includes background and identification checks. Staff will always investigate any allegations from customers or the wider community regarding potential tenancy fraud.

Poverty

The Poverty Strategy links to Grampian's online Modern Slavery Statement.

Training

Grampian is committed to continuously improving our training on modern slavery, and we ensure that all of our relevant employees are trained on risks, policies and standards related to modern slavery, human trafficking and forced labour.

Training is provided via a briefing note and online video available to all staff which highlights the signs of modern slavery and exploitation and how to seek help. Frontline staff who visit tenants and service users are trained to identify signs of exploitation and understand that instances of this should be reported to managers who would then work with other agencies including social work and Police Scotland to assess such cases

Update on 2024-25 commitments

- **Staff training** – we reissued the Modern Slavery Guidance internally
- **Safeguarding Officers** - Safeguarding Officers received refresher training.
- **Modern Slavery & Exploitation Helpline** – continued to promote the helpline site via a website link

New commitments 2025-26

We will:

- **Suppliers** – write to Grampian's high-value (by Grampian's spend) contractors to confirm our position regarding Modern Slavery and the requirements that we have for our suppliers.
- **Safeguarding Officers** - Safeguarding Officers will receive refresher training.
- **Staff training** – we will reissue the Modern Slavery Guidance internally and ensure training is provided as required for new staff.

- **Risk assessment** – Grampian will conduct thorough risk assessments and identify areas within the business where the highest risk of modern slavery exists, including procurement, contracting, recruitment, and customer facing roles.
- **Measuring effectiveness** – through effective monitoring, Grampian will ensure that targets are met, and robust modern slavery due diligence is a business as usual activity. Where room for improvement is identified, appropriate action will be taken to rectify gaps in our policy and practices.
- **Equality Impact Assessment** – Grampian’s Modern Slavery Statement will be subject to an Equality Impact Assessment.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2025.

Malcolm McNeil
Secretary/Depute CEO

23 September 2025