

# MODERN SLAVERY STATEMENT 2024

## **Introduction**

This is the Bugler Group Ltd. Modern Slavery Statement which sets out the steps taken by Bugler Group Ltd., Bugler Developments Ltd., Bugler Homes Ltd., and Bugler Land Ltd. to prevent modern slavery and human trafficking in our supply chains or in any part of our business. We are a values-driven organisation and as such, there is a zero-tolerance attitude towards slavery and trafficking of any kind. We expect our supply chain and contractors to comply with our values and to have appropriate policies and processes that address slavery and human trafficking.

## **Part one: Organisation Structure and Supply Chains**

Bugler Group Ltd. is an award-winning multi-disciplinary property construction and development business that has been building high quality homes throughout London and the South East since 1982. With an annual turnover of £100m+ and over 100 employees, we also have a contracting arm (Bugler Developments), private housebuilding arm (Bugler Homes) and a land acquisition arm (Bugler Land). All divisions across the Bugler Group adhere to our Modern Slavery Statement.

Our supply chain is a vital part of the delivery of our new homes and we are pleased to have many long-standing relationships across the supply chain network. We hold annual Supply Chain events to reinforce the importance of ethical, safe working practices and highlight examples of best practice from across our Supply Chain. In 2024 we held our second Supply Chain event to positive feedback from all involved.

## **Part two: Policies in relation to slavery and human trafficking**

Each year, our Modern Slavery and Human Trafficking Policy is updated as required and formally reviewed by the Bugler Group Ltd. Board of Directors.

Any amendments are reissued and communicated to all employees, supply chain and people working on our behalf. All company policies are available to view internally on our intranet site, and visible in cabins across our building sites.

If modern slavery is suspected in our business or supply chain, employees must report it through our business reporting channels or whistleblowing lines. All information received is dealt with swiftly by our Board of Directors.

### **Part three: Due diligence processes**

Our Board of Directors will ensure that Bugler Group Ltd. as part of our standard due diligence processes, will:

- Monitor right to work documentation
- Conduct payroll audits
- Maintain a level of communication and personal contact with the supply chain to ensure their understanding of, and compliance with, our expectations regarding modern slavery and human trafficking
- Regularly review supply chain policies, codes of conduct and our working practices to demonstrate commitment.

### **Part four: Risk assessment and management**

We are regularly audited by an independent third party organisation across our network of live building sites and at our Head Office, to ensure risk assessments are carried out to make sure we are managing all aspects of modern slavery and human trafficking.

### **Part five: Key performance indicators to measure effectiveness of steps being taken**

There are several indicators of modern slavery, including aspects such as restriction of movement, isolation, withholding of wages or identity documents. As a business we are in the process of establishing a number of key performance indicators to measure the effectiveness of steps being taken across the business with regard to monitoring modern slavery and human trafficking.

### **Part six: Training on modern slavery and trafficking**

Through relevant training on modern slavery and trafficking we aim to raise awareness of the signs of modern slavery and human trafficking across our team.

We are currently sourcing and introducing new eLearning to all our employees and supply chain on modern slavery and human trafficking.

### **Concluding statement**

This statement is made and published in accordance with Section 54 (1) of the Modern Slavery Act 2015 and constitutes the company's Modern Slavery and Human Trafficking statement. The Bugler Developments Ltd. Board of

Directors approved this statement on 16<sup>th</sup> July 2024 and will review and update the statement on an annual basis.

Signed by:

Andy Bugler

Bugler Group CEO

On: Tuesday, 6<sup>th</sup> August 2024