

## **Tilia Homes Limited (Tilia Homes)**

### **Modern Slavery Act 2015 Statement for the financial year ended 31 March 2024**

#### **Introduction**

This statement is made on behalf of Tilia Homes Limited (company number 00775505) pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2024.

This is the 4th statement made on behalf of Tilia Homes and sets out the steps that we continue to take to prevent modern slavery and human trafficking in our business and supply chains.

#### **Our Business and Structure**

Tilia Homes is a limited liability company incorporated in the UK and headquartered in Solihull. It is directly owned by Untypical Limited (registered in Guernsey under company number CMP68992), which is part of the Terra Firma Group.

Based out of four offices in Warrington, Bedford, Solihull and Exeter, we are a UK housing development company. Our day to day operations involve the purchase of land to construct houses for sale on the open market and to affordable housing providers. To enable the delivery of the units, we have relationships with a large number of subcontractors and, every day, a significant number of their employees will be working on our sites, in addition to our own employees. We also rely on a number of manufacturers and suppliers which, in turn, will source products from their respective supply chains.

Our supply chains include sub-contractors, material suppliers, building merchants, environmental and design consultants, architects, surveyors, ground workers and other trades and services such as brick layers, plumbers, cleaners and plumbers associated with house building and development.

#### **Our policies and approach**

We have a number of policies which are designed to manage the risks relating to modern slavery and human trafficking, including our Code of Conduct, Anti- Slavery and Human Trafficking Policy, Whistleblowing Policy, Anti Bribery and Corruption, Equality Diversity and Inclusion policies, Bullying and Harassment policies (all of which are available on our Intranet and from our HR department). These policies confirm our 'zero tolerance' approach to modern slavery and human trafficking in our business and supply-chain. We are committed to acting ethically and with integrity and to maintaining systems and controls which are designed to prevent slavery and human trafficking from taking place in our business or across our supply-chain. Our Whistleblowing Policy provides a mechanism for our employees and others working in our supply-chain to report suspected breaches of these policies.

There have been no incidents of modern slavery or human trafficking reported at any of our sites or offices for the year ended 31 March 2024.

The risks relating to slavery and human trafficking can apply anywhere in our operations. The main areas of risk for Tilia Homes lies in our workforce and supply chain. In addition to the list below, therefore, in 2024 we have set up a Preferred Supplier Agreement with supply agencies to ensure all workers have been sourced through an approved list per site, per region. This avoids any risk of employing workers without the Right to Work who have not been properly vetted or identified. In addition, through our contractual appointments and agreements, we expect our suppliers and sub-contractors to ensure that there is no slavery or human trafficking in their own supply-chains. If issues are identified (including through our audit process) which are not resolved to our satisfaction, we review the relationship with the relevant organisation and take remedial action, as appropriate.

Our approach to assessing and managing the risk of modern slavery and human trafficking is as follows:

1. We have a company-wide policy confirming our 'zero tolerance' approach to slavery and human trafficking.
2. We require our sub-contractors and suppliers to acknowledge their responsibility for complying with all legislation relating to modern slavery and human trafficking, as updated or replaced from time to time.

3. Our contractual terms include obligations on our sub-contractors and suppliers (and in turn their agents, employees and sub-contractors) to comply with all legislation relating to modern slavery and human trafficking, as updated or replaced from time to time..
4. Our policies require our sub-contractors to complete an assessment to confirm that they comply with Tilia Homes' approach to modern slavery and human trafficking.  
We work with a leading accreditation company in the UK, CQMS, to develop the common standards applicable to our sub-contractors.
5. We undertake checks on new recruits to ensure that they are eligible to work in the relevant country of employment.
6. We continue to deliver training to employees about modern slavery and human trafficking and how to take steps to prevent it.
7. We monitor, through Tilia Homes' internal, standalone compliance policies and procedures, the implementation of our policies, training and procedures which relate to modern slavery and human trafficking. This includes mandatory training for new joiners, of which rates of completion are monitored monthly, and failure to complete within a deadline is a disciplinary matter.

### **Next steps**

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking. Next steps will include:

1. For the period covered by this statement, we have been working towards PAS91 compliance in which we can ask potential contractors and suppliers to complete as part of their prequalification process for construction projects one module specifically dedicated to Modern Slavery. Via CQMS we can also run periodic reports to check on compliance with that module.
2. We are signing up to the Supply Chain Sustainability School which can provide suppliers with learning pathways to prevent, identify, manage, mitigate and remediate modern slavery and labour exploitation risks, across their operations.
3. Under our Compliance Framework, keeping under review our Anti-Slavery and Human Trafficking Policy (and related policies) and the related procurement standards.
4. Continuing to assess the risks of modern slavery and human trafficking in our business and our supply chain.
5. With the help of CQMS, regularly assessing our pre-qualification standards for the appointment of new suppliers and subcontractors. In particular, asking suppliers to complete an assessment to confirm that they comply with all legislation relating to modern slavery and human trafficking, as updated or replaced from time to time.
6. Through Tilia Homes' newly formed risk register, assessing key modern slavery and human trafficking risks in the business and supply chain, and taking necessary steps to mitigate the risk.
7. Auditing key supply-chain partners to assess their controls, with a target set for FYE 2025 of 10%.
8. Reviewing and updating our programme to identify and manage any modern slavery and human trafficking risks associated with high-risk goods and services.
9. Keeping under review the due diligence procedures for our supply-chain, which apply both prior to appointment and thereafter, with a target set to review the procedures for FYE 2025 of 10% of our supply chain.
10. Auditing key providers of temporary labour, with a target set to review the procedures for FYE 2025 of 100% of our supply chain.
11. Providing up to date training to new joiners and to our existing employees on identifying potential modern slavery or human trafficking within our operations and supply chain. One condition of each new joiner employment contract is that the 4-month probationary period is passed only if modern slavery and human trafficking training is undertaken and passed. Thereafter annual training must be undertaken by each employee.
12. Monitoring the effectiveness of steps taken by Tilia Homes to ensure modern slavery and human trafficking is not taking place, by setting performance indicators as it deems appropriate (e.g., percentage of suppliers vetted for adequate practices; number of suppliers screened; and inspections of sub-contractors).

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Tilia Homes' modern slavery and human trafficking statement for the financial year ended 31 March 2024. It was approved by Tilia Homes' board of directors on 9 January 2025.

Signed on behalf of the board of directors of Tilia Homes by:

Signed by:  
  
6494B086BAC3426...  
James Hiles  
Group Finance Director  
Tilia Homes Limited