

Modern Slavery and Human Trafficking Statement

Martin Grant Homes Limited are proud of the ethical standards that it has embedded into its business over many years, and believes that these standards are consistent with the underlying principles of the Modern Slavery Act 2015. Slavery and the trafficking of people have no place in the modern world, and Martin Grant Homes is committed to implementing and enforcing effective systems and controls to enforce our zero-tolerance approach to modern slavery and human trafficking.

Company Structure

Martin Grant Homes Limited is an independent and family owned housing developer and builder employing directly circa 96 people. Our work takes place predominantly within London and the home counties of the UK with an annual turnover of approximately £100 million.

This statement is made on behalf Martin Grant Homes Limited in accordance with the requirements of the Modern Slavery Act 2015, and its contents take account of the activities and supply chain. This statement has been approved by the Board of Directors of Martin Grant Homes Limited and signed by Christopher Hamilton, Managing Director.

Our policy on anti-slavery and human trafficking and our code of conduct

Martin Grant Homes Limited are committed to ensuring, so far as we are able, that there is no modern slavery or human trafficking in our supply chain or in any part of our business and we take a zero-tolerance approach to slavery and human trafficking. Our supply chain includes sub-contractors, suppliers, labour agencies and professional services providers. Our Anti-Slavery and Human Trafficking Policy reflects a commitment to acting ethically and with integrity in all of our business relationships, supported by the development and implementation of effective systems and controls.

Our anti-slavery and human trafficking assurance process

As part of an initiative to identify and mitigate risk in respect of slavery and human trafficking we will:

- Carry out a slavery and human trafficking risk assessment to enable us to apply a risk-based and proportionate approach to dealing with slavery and human trafficking issues;
- Update our Anti-Slavery and Human Trafficking Policy based upon our risk assessment;
- Review the contracts that we have with our supply chain and amended these to require compliance with the Act;
- Mandate, where appropriate, that our supply chain be registered with the SMAS validation system, which requires our supply chains to confirm their compliance with the Act;

- Update our pre-qualification questionnaires (which form part of our process for accepting our supply chain onto our approved supplier list) to include specific questions on modern slavery and human trafficking. The responses to these questionnaires are reviewed by our commercial team;
- Obtain information on the measures that our supply chain are carrying out to ensure that modern slavery and human trafficking is not taking place. Where we consider that these measures are not sufficient, we will work with our supply chain to improve their approach;
- Widened the scope of the Martin Grant Homes Limited whistle-blowing procedure to include the reporting of modern slavery and human trafficking issues, so that any individual may confidentially raise a potential issue.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and business we will provide training to our staff on the Modern Slavery Act that is proportionate to the level of risk, comprising online and face-to-face training where appropriate.

Future development

Continuous internal monitoring of our supply chain remains a priority for Martin Grant Homes Limited. Those suppliers that have been identified as high risk will be more heavily monitored to ensure that their working practices (and those of their supply chain) are compliant.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Martin Grant Homes Limited for the financial year ending 31 December 2018.

Chris Hamilton, Managing Director

For and on behalf of Martin Grant Homes Limited

Date: 31st January 2019