

SHH Modern Slavery and Human Trafficking Policy

1. Policy Statement

Swallow Hill Homes Limited is committed to acting ethically and with integrity in all our business dealings and relationships. We are committed to preventing slavery and human trafficking in our corporate activities and our supply chains. We fully support the objectives of the Modern Slavery Act 2015 and will not tolerate any form of slavery or human trafficking within our operations.

2. Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.¹

3. Our Commitments

- **Supply Chain:** We expect all our suppliers and contractors to adhere to the same high standards we set for ourselves. We are committed to ensuring that our supply chains are free from modern slavery.
- **Risk Assessment:** We will conduct risk assessments of our supply chain to identify and mitigate areas of potential concern regarding modern slavery.
- **Training:** We will ensure that relevant staff are aware of the risks of modern slavery and human trafficking in our business and supply chains.

4. Responsibilities

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations. All employees are expected to report any concerns regarding modern slavery, and we will support any individual who raises genuine concerns in good faith under this policy.

5. Compliance

Any breach of this policy will be taken seriously and may result in disciplinary action or the termination of our relationship with any supplier or contractor.

6. Review

This policy will be reviewed annually to ensure its ongoing effectiveness and compliance.