

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made on behalf of CALA Group (Holdings) Limited and its group companies ("CALA") and is CALA's modern slavery and human trafficking statement for 2021.

CALA continues to support the objectives of the Modern Slavery Act 2015 (otherwise referred to as "the Act") and are committed to trading ethically and upholding the highest standards in everything we do. We aim to ensure that no modern slavery, human trafficking or forced labour is present in any part of our business or supply chain.

OUR STRUCTURE

We are a UK national house builder and are headquartered in Scotland with eight regional offices located throughout the UK.

All of our operating sites are currently in Scotland and England. Our main business activities are acquiring land for development and building premium homes with sensitivity and consideration, in desirable locations. We take great pride, not just in our product, but also in the outstanding levels of service we give to our homebuyers.

The annual turnover of CALA for the financial year ended 31 December 2020 was £705 million. CALA's main trading entity is CALA Management Limited, which also adopts this statement.

CALA currently directly employs approximately 1,164 people. We are committed to fair employment practices and (as a minimum) to following all applicable employment laws.

OUR SUPPLY CHAINS

Our supply chains include building contractors, sub-contractors, product suppliers and professional consultancies e.g. architects and land surveyors. Other suppliers to our business are professional services firms such as lawyers, accountants and other consultants.

The majority of our onsite construction is carried out through our sub-contractors and our building materials sourced through suppliers. We seek to develop and sustain on-going trusted relationships with our sub-contractors and suppliers and honesty and transparency is at the forefront of these relationships.

We have identified that the main areas of risk of modern slavery at CALA would be our sub-contractors and suppliers. We are confident that these risks are being addressed through the methods outlined in this statement and our ongoing commitment to continually reviewing and improving our practices in relation to this.

We want to work with suppliers and sub-contractors who share our commitment to tackling modern slavery. We will continue to review our practices, policies and procedures to establish the best way of incorporating our policy on modern slavery, with the goal of ensuring that any third parties with whom we deal are making maximum efforts to prevent forced labour and human trafficking in their business.

Our construction contracts include robust anti-slavery provisions that not only bind CALA's contractors but also imposes obligations on them to cascade the provisions down the supply chain. Further, during 2020, we joined the Supply Chain Sustainability School (labour group) which seeks to set minimum standards for the industry in respect of identification and management of Modern Slavery.

In 2021, we shall become a member of the Gangmasters and Labour Abuse Authority's (GLAA) Construction Forum.

OUR POLICIES

We act ethically and with integrity in all of our business relationships. This is reflected in our Statement of Ethics, Anti-Bribery Compliance Policy and Guidelines for Service Providers and our Sustainability and Health & Safety policies. We carry out a thorough selection and verification process with our existing and prospective suppliers and service providers and will take action if suppliers and service providers do not meet our standards.

We are committed to improving our practices to combat forced labour and human trafficking in all its forms within our business and supply chains.

TRAINING

During 2021 we shall continue to review our practices, policies and procedures. We intend to:

- Maintain and enhance our high quality of employee training – ensuring awareness of the principal indicators where someone could have fallen victim to modern slavery – and ensuring that this training is undertaken on an annual basis by employees;
- Introduction of a new auditing scheme whereby we undertake random, unannounced spot checks of our sites with a report on the findings and continue our stringent, continual process on ensuring that our employees all have eligibility to work in the UK in order to uphold our application of the Act across the business;
- Amend (where required) all supplier and subcontractor terms and conditions, or other agreement types, to ensure that our suppliers and subcontractors comply with all anti-slavery and human trafficking legislation in force at the time of entering those agreements;
- Engage and collaborate more effectively with our suppliers and subcontractors in respect of our compliance requirements with the Act and our collective understanding and transparency to the actual workforce on our sites and in our supply chains;
- Display posters and other guidance materials throughout our sites in order to highlight our commitment to preventing modern slavery and to provide a direct hotline as well as our whistleblowing contact telephone number;
- Continue to analyse our practices, policies and procedures on an annual basis for overall risk of exposure to modern slavery and for the development of future actions so that our business can consistently improve its processes.

We have specifically highlighted the issue of modern slavery to our employees through internal communications. They are required to report concerns and management are required to investigate and, where necessary, take appropriate action on any concerns expressed.

COMMITMENT

CALA is committed to increasing its understanding of the risks of modern slavery. We shall continue to dig deeper and risk assess our supply chains and shall continue to engage and draw on the experiences shared across the industry.

This statement is made and published in accordance with section 54 of the Modern Slavery Act 2015. It has been approved by the board of directors of CALA Group

**(Holdings) Limited and CALA Management Limited and is signed by, Kevin Whitaker,
Chief Executive.**

A handwritten signature in black ink that reads "Kevin Whitaker". The signature is written in a cursive, flowing style.

January 2021