

## 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 2024.

Cala continues to support the objectives of the Modern Slavery Act 2015 (otherwise referred to as “**the Act**”) and is committed to trading ethically, and upholding the highest standards, in everything it does. Cala aims to ensure that no modern slavery, human trafficking or forced labour is present in any part of its business or supply chain.

### **OUR STRUCTURE**

Cala is a UK national housebuilder and is headquartered in Scotland with eight regional offices located throughout the UK.

All of its operating sites are currently in Scotland and England. Cala’s main business activities are acquiring land for development and building premium homes with sensitivity and consideration, in desirable locations. Cala takes great pride, not just in its product, but also in the outstanding levels of service Cala gives to its homebuyers.

The annual turnover of Cala for the financial year ended 31 December 2023 was £1.25bn. Cala’s main trading entity is CALA Management Limited, which also adopts this statement. Cala currently directly employs approximately 1,300 people. Cala is committed to fair employment practices and (as a minimum) to following all applicable employment laws.

### **OUR SUPPLY CHAINS**

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

The majority of Cala’s onsite construction is carried out through its sub-contractors and its building materials sourced through suppliers. Cala seeks to develop and sustain ongoing trusted relationships with its sub-contractors and suppliers and honesty and transparency is at the forefront of these relationships.

Cala has identified that the main areas of risk in respect of modern slavery for Cala are its sub-contractors and suppliers. Cala is confident that these risks are being addressed through the methods outlined in this statement and its ongoing commitment to continually reviewing and improving its practices in relation to this.

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

Cala has continued to engage and collaborate with its suppliers and sub-contractors in respect of its compliance requirements with the Act and its collective understanding and transparency to the actual workforce on its sites and in its supply chains. This has included:

1. ensuring Cala’s construction contracts include robust anti-modern slavery provisions that not only bind Cala’s contractors but also impose obligations on them to cascade the provisions down the supply chain; and
2. operating a Sustainable Procurement Policy and requiring Cala Group suppliers to sign up to its Supplier Code of Conduct. Cala implements the Policy and Code of Conduct by requiring new Cala Group suppliers to complete an associated questionnaire which covers modern slavery practices. This provides Cala with the opportunity to challenge suppliers’ practices,

should Cala not consider them to be adequate, and emphasises the importance of ensuring that effective modern slavery practices are in place.

## **CALA'S MEMBERSHIPS**

Cala is a member of:

1. 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; and
2. the Gangmasters and Labour Abuse Authority's (GLAA) Construction Forum, which seeks to protect vulnerable and exploited workers.

## **TRAINING**

Cala maintains high quality annual, mandatory employee training in respect of modern slavery which aims to raise awareness of the principal indicators that someone could have fallen victim to modern slavery.

## **OUR POLICIES**

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

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

During 2024 Cala intends to:

1. maintain its high quality of employee training – raising awareness of the principal indicators of modern slavery;
2. maintain its memberships of the Supply Chain Sustainability School (Labour Group) and the Gangmasters and Labour Abuse Authority's (GLAA) Construction Forum, to drive improvements and progress across the industry;
3. continue to engage and collaborate effectively with its suppliers and sub-contractors in respect of its compliance requirements with the Act and its collective understanding and transparency to the actual workforce on its sites and in its supply chains;
4. continue to display posters, and other guidance materials, throughout its sites in order to highlight its commitment to preventing modern slavery and to provide a direct hotline as well as its own whistleblowing contact telephone number;
5. continue to analyse its practices, policies, and procedures for overall risk of exposure to modern slavery and for the development of future actions so that Cala can consistently improve its processes; and
6. continue to operate its Sustainable Procurement Policy and require Cala Group suppliers to sign up to its Supplier Code of Conduct.

Cala has specifically highlighted the issue of modern slavery to its employees through internal communications. They are required to report concerns, and management are required to investigate and, where necessary, take appropriate action, in respect of any concerns expressed.

## **COMMITMENT**

Cala is committed to increasing its understanding of the risks of modern slavery. Cala shall continue to dig deeper and risk assess its 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, slightly slanted style.

**January 2024**