



Houlton Anti-Slavery and Human Trafficking Statement

Anti-Slavery and Human Trafficking Statement for the Financial Year 2021-2022 made on behalf of the Geo Houlton & Sons Group further to the provisions of the UK Modern Slavery Act 2015.

Statement made by the Chairman of Geo Houlton & Sons (Holdings) Limited

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

This statement was discussed and approved by the Board of Directors of Geo Houlton & Sons (Holdings) Ltd at a meeting on 20 October 2021. Accordingly this statement should be considered to constitute the slavery and human trafficking statement for Geo Houlton & Sons (Holdings) Limited and all companies within the Geo Houlton Group for the 2021-2022 financial year and all future financial years until it may in future be modified or amended.

We are proud of the conditions of employment for all our employees and the recruitment processes we have in place. Given the nature of our business, our board and management teams each consider that there is minimal risk that we are in any way involved in or even tangentially supportive of, or complicit in slavery and human trafficking. Nevertheless, we are committed to improving our practices to combat slavery and human trafficking.

The employment and procurement practices operated by our businesses ensure that our companies are rightly viewed as excellent and supportive employers. We further operate as a purchaser of goods or services and expect a high level of ethical conduct from those businesses with which we do business within our supply chain.

ORGANISATION'S STRUCTURE

We are a manufacturer and provider of public, commercial, industrial and domestic properties in the construction, development, building and maintenance sectors. Our ultimate parent company is Geo Houlton & Sons (Holdings) Limited. Our complete structure is as follows:-



Collectively "Geo Houlton Group".

We have over 125 employees and operate solely in the UK from one registered office address.



OUR SUPPLY CHAINS

Our supply chain partners include suppliers of goods and services to the business including sub-contractors for the various construction operations including specialists, agency workers, volunteers, agents, consultants, and business partners.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Geo Houlton Group has zero tolerance approach to modern slavery and human trafficking. The implementation of our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain partners.

You can access the Policy here <http://houlton.co.uk/downloads/>

This Anti-Slavery Policy Statement is intended to inform and influence all employees and suppliers with whom we have a business relationship with.

We will continue to implement and enforce effective systems and controls to ensure (amongst our other priorities) that slavery and human trafficking is not taking place anywhere in our business or related supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) these include the policies and procedures in the following areas:

- Duty to report misconduct; and
- Corporate and Social Responsibility

We also articulate a series of employee rights and benefits available to employees in the employee handbooks and individual contracts of employment for each member of staff.

Each of the subsidiary operating companies has a Managing Director who has reviewed and agreed to the terms of this statement. Each of these departments and executives have reporting responsibilities to management and the various boards of companies within the group structure. The Geo Houlton Group use the services of Smailes Goldie as the external auditor and the Directors receives annual update reports from the external auditors. The Company is a founding member and actively involved with the Hull Building Safety Group which provides independent audits of our sites.

Houlton's role in the local community is an integral part of the business, we therefore actively seek to employ local people and apprentices are employed each year through liaison with the CITB.

A combination of these procedures and functions operate to help identify, assess and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chains.

We adhere to the UK's set living wage and national minimum wage amount for all of our employees and we carry out annual reviews of our employee's salaries, including taking into



account the operatives wage rates as per the Construction Industry Joint Council 'Working Rule Agreement'.

RISK ASSESSMENT

This is the annual articulation of a formal Anti-Slavery Statement for the Geo Houlton Group. Although we include reference to our Anti-Slavery and Human Trafficking Statement within our terms and conditions which are sent to our suppliers on engagement of services we will also seek to ensure when entering into material contracts that all those in our supply chain and contractors comply with our Anti-Slavery and Human Trafficking values in particular when seeking tenders for service or when auditing our suppliers.

The prevention, detection and reporting of slavery and human trafficking in any part of the Company's business or supply chains is the responsibility of all working for the Company or under the Company's control. They are all required to avoid any activity that might lead to a breach of this statement. Anyone who has a genuine concern is encouraged to report this to their line manager who are required to act and ensure no slavery or human trafficking is taking place.

You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information or guidance on modern slavery.

TRAINING

We will communicate this statement and our policy to all our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business. We will ensure new employees are familiarized with this statement as part of their induction process. We aim to put in place regular training sessions to remind staff of our continuing obligations. We also operate an open door policy to all of our staff and those in management positions are dedicated (along with other priorities) to ensuring awareness and transparency in relation to Anti-Slavery and Human Trafficking.

MEASURING EFFECTIVENESS

The Director's will review this statement annually to ensure that its implementation is effective in ensuring the Geo Houlton Group and its Supply Chain are free of slavery and human trafficking.

Director

A handwritten signature in blue ink, appearing to read "P. Dickerson".

Geo Houlton & Sons (Holdings) Limited

Date: 18-11-21