



MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

The Kingerlee Group of companies is committed to ensuring there are no acts of modern slavery or human trafficking within its own business or within its supply chain. This statement is made pursuant to the Modern Slavery Act 2015, and relates to all operating companies within the Group being: Kingerlee Holdings Ltd, Kingerlee Ltd, Kingerlee Homes Ltd and T H Kingerlee and Sons Ltd.

Established in 1868, the Group is engaged primarily in construction and property development activities solely within the UK. It has been providing high quality building in and around Oxfordshire for five generations.

The Group operates a robust recruitment policy, with all appointments having met personally with directors. The Group also operates a Whistleblowing Policy, so that all employees are able to raise any concerns without fear of reprisal regarding how colleagues are treated or about practices within our supply chain.

Our policy for our supply chain is to build long standing relationships, with our ethical approach being clearly communicated. The Group will not support or deal with any business knowingly involved in slavery or human trafficking.

As part of the companies due diligence processes into slavery and human trafficking, the supplier approval process will incorporate a review of controls undertaken by the supplier. Import of materials from outside of the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. If the supply chain is international our point of contact is preferably with a UK company or branch and we will seek assurances that these entities have suitable anti-slavery and human trafficking policies and processes.

The directors within the Group shall take responsibility for implementing this policy statement and its objectives. They shall provide adequate resources (such as training or supplier visits) and investment to ensure that slavery and human trafficking is not taking place within the Group or its supply chain.

This policy statement will be reviewed annually and published on all Group websites.

Signed on behalf of Kingerlee Group

A handwritten signature in black ink that reads "David Kingerlee". The signature is written in a cursive, slightly slanted style.

David Kingerlee
Chairman

Date Approved: 22nd May 2017