



LIONCOURT
HOMES

Modern Slavery Statement

2	April 2021	Policy Review
1	June 2019	New policy.
Version	Date	Purpose of the new revision

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1. Statement intention

The purpose of this statement is to raise awareness within our organisation and our supply chain of the legal obligations and stance of Zero Tolerance our business and its leaders hold in relation to all forms of Modern Slavery and Human Trafficking.

Our aim is to develop, maintain and continually monitor how our Company can positively impact Modern Slavery and Human Trafficking through its business activities.

2. Our Business

Lioncourt Group has two businesses within the umbrella, Lioncourt Strategic Land and Lioncourt Homes.

Lioncourt Homes builds high quality homes for private sale. The structure consists of a Board of Directors, Non-executive Board and investors. Lioncourt Homes employs 100 managerial and technical professional employees to oversee a highly skilled sub-contract workforce who build our housing developments.

Lioncourt Strategic Land was specifically established to identify and purchase land for planning promotion which may be fed into the homes business or sold. Lioncourt Strategic Land employs 4 land and planning specialists.

3. Our Supply Chain

Our supply chain is stable, largely consisting of long term relationships with sub-contract businesses who have worked in partnership with Lioncourt Homes since our inception.

Although variable dependent upon our level of activity, we estimate our supply chain consists of 50 sub-contract business including; groundworkers, house building trades, material manufacturers, suppliers, utilities companies, and specialist consultancy services.

4. Modern Slavery and human Trafficking policy

Our policy is to ensure that in the undertaking of our business activities we do not under any circumstances tolerate, knowingly or through ignorance, any form Modern Slavery and Human trafficking including; the recruitment, transportation, transfer, harbouring, or receipt of persons by improper means such as force, abduction, fraud, or coercion for an improper purpose including forced labour or sexual exploitation.

5. Due diligence and prevention

In considering due diligence and preventative actions Lioncourt Group has committed to the following measures:

- Re-issue of our sub-contract terms and conditions including our expectations of our supply chain in relation to our Company and their commitment to the prevention of Modern Slavery and Human Trafficking
- Issue of a CEO statement on Modern Slavery and Human Trafficking to all current and future sub-contract organisations
- Sub-contract appraisal included into tender documentation requiring the demonstration of;
 - o country or origin for manufactured goods
 - o a statement of the commitment to positively impact Modern Slavery and Human Trafficking or request the organisations own statement to be submitted where turnover requires
 - o a description of third-party supply chain(s)
- Mandatory training for key disciplines in the identification of high-risk indicators
- Mandatory training for all business leaders and senior managers

- The company Whistle Blowing Policy is available as a means to raise any improper, unethical or illegal behaviour.

6. Areas of risk

Areas of exposure to higher risk of Modern Slavery and Human Trafficking have been identified within the following business areas:

- Employment and specifically agency workers
- Appointment of sub-contractors and instances of extended supply chains
- Material suppliers and manufactures.

7. Effectiveness of policy

The effectiveness of our policy will be reviewed by evaluating;

- The compliance of sub-contractors and suppliers in completing our sub-contract appraisal document annually
- Random procurement audits at unprescribed intervals to support compliance
- internal training compliance annually