



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FOR FINANCIAL YEAR ENDING 31 DECEMBER 2021

INTRODUCTION FROM THE GROUP CHIEF EXECUTIVE

Willmott Dixon Holdings Limited is a national contracting and interior fit-out business operating solely in the UK undertaking the delivery of substantial capital projects for a wide variety of customers in both public and private sectors. Willmott Dixon is dedicated to leaving a positive legacy in the communities and environment it operates in and is committed to acting ethically and with integrity in all business dealings.

We recognise that modern slavery exists within the UK construction industry. Over the last few years we have been implementing procedures and training within our business and across our supply chain to raise awareness of the issues in order to be able to identify and tackle the problem if it were identified. We have set out plans for the coming year to continue this work. Our values are strongly focused on people, relationships and ensuring a sustainable future. Our approach to tackling modern slavery builds upon these values.

OUR SUPPLY CHAIN

Our supply chain is large and varied and includes consultants, sub-contractors, labour agencies, product and material suppliers, joint venture partners and ranges from highly skilled professionals to semi-skilled labour and includes both large and small businesses. The highly tiered, fragmented, and global nature of our construction supply chains means this is the greatest focus for our modern slavery policy. Achieving greater transparency, particularly beyond the first tier of our partners, is a key challenge that we continuously strive to address through educating and raising awareness.

To better understand the risks within our supply chains we have undertaken a risk mapping exercise, in-line with ISO 20400, to identify those areas most vulnerable to modern slavery practices and those trades most in need of our attention and support. This has guided the interventions and processes we have put in place to date and will continue to inform our future plans.

We believe that we have made significant improvements in mitigating the risk of modern slavery being present within our supply chain on our sites but understand that there will always be scope for improvements that can be made in the process and procurement strategy of the products and services we incorporate in our projects.

Our next phase in combatting the risk of modern slavery in the UK construction market, and particularly our business, will be to focus on our interaction with, support of and guidance to our goods supply chain partners.

In 2019/2020 we:

- Created new labour agency supplier lists including only those businesses with strong and robust anti-slavery, labour exploitation and right to work processes in place
- Provided guidance to all our supply chain partners on their responsibilities under the Right to Work Act, what processes they need in place and what questions to ask when engaging labour agencies

- Increased the proportion of our sites with biometric turnstile access installations to improve transparency of who is on our sites¹
- Piloted new non-touch biometric access control systems in response to the Covid-19 pandemic
- Reviewed the policies and processes of all our strategic goods partners producing fact-files with supporting evidence for our people to understand how they are tackling modern slavery as well as other issues

In 2021 we will:

- Work with our existing strategic goods partners to identify opportunities to enhance our collective policies and strategies for tackling modern slavery
- Ensure our preferred suppliers in the five most 'at risk' categories of our supply chain commit to undertake training, at director level, on tackling modern slavery

INDUSTRY COLLABORATION

We recognise the importance of working together for the benefit of the industry as this issue cannot be tackled alone.

As one of the founding sponsors of Stronger Together's construction programme, we are working to raise awareness of the risks of modern slavery in our sector, and to develop capability in our business and through our supply chain to tackle the problem. Our sponsorship enables anyone to access free resources on how to tackle modern slavery including worker leaflets and posters in multiple languages plus an award-winning video for use in inductions and awareness-raising.

We also remain a signatory of the Gangmasters and Labour Abuse Authority's (GLAA) Construction Protocol which is a joint agreement aimed at establishing collaboration within the construction industry. The Protocol commits signatories to work in partnership to protect vulnerable workers, share information to help stop or prevent exploitation and commit to raising awareness within the supply chain.

Willmott Dixon is a key member of the Home Office Advisory Group on Migrant Status and Right To Work checks and the Supply Chain Sustainability School Construction Leadership Group, which enables us to keep abreast of legislative requirements and issues within the construction industry.

In 2019/2020 we:

- Continued to work with Stronger Together to deliver modern slavery workshops to people in our business and in our supply chain
- Supported the development of the Supply Chain Sustainability School's People Charter and signed up to it (the charter sets minimum labour standards for the construction industry)

In 2021 we will continue to work closely with these organisations to raise the performance of our sector including a detailed investigation of at least one high risk trade.

OUR POLICIES, STRATEGY AND GOVERNANCE

Along with our Modern Slavery Policy, we have a number of other related corporate policies setting out our commitment to eradicating modern slavery, all of which are available on

¹ Fingerprint recognition systems deactivated during pandemic

Document Name	Ref	Document Owner	Issue No	Effective date:
Slavery & Human Trafficking Statement	LR028	Michael Cross	1	March 2021

our website. They demonstrate a consistent approach to our people, our supply chain's people, their collective safety and zero tolerance to modern slavery.

In 2019/2020 we:

- Made updates to our Modern Slavery Policy, Sustainable Procurement Policy, Code of Ethics and Whistleblowing Policy. Collectively, these provide guidance on how to spot the signs of possible slavery, how to raise, and deal with concerns without fear of reprisal as well as how concerns will be investigated
- Included the Modern Slavery policy as a mandatory read for our people at induction
- Put declarations in place to ensure that our supply chain partners declare they comply with the Modern Slavery Act as part of our pre-qualification process
- Created a code of conduct to ensure the obligations that we place on our supply chain are clear and ensure they are aware of their compliance requirements. The code of conduct has been sent to all partners, including labour agencies that we engage with
- Carried out a series of on-site project reviews to check performance against our Modern Slavery Policy and Sustainable Procurement Policy; putting actions in place for improvement where necessary
- Worked with the University of Liverpool to conduct interviews across our business to review our approach to modern slavery to give us more insight into additional measures we can put in place

In 2021 we will:

- Review our Business Continuity Plan to test our response to a case of modern slavery on one of our sites
- Update our internal policies and codes to ensure they remain relevant and clear

DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY RISK AND SUPPLIER ADHERENCE

Our supply chain contract documents include legal obligations to comply with the Modern Slavery Act and our Modern Slavery Policy.

We support our supply chain partners by providing them with advice and guidance with regards to the 'Right to Work' process. In 2017, we created training videos (sponsored by the CITB) which were sent to our supply chain partners alongside a letter from our Group Chief Executive outlining their responsibilities under the relevant legislation. These videos are still available to our suppliers and our people. In 2019 we re-issued the videos to our supply chain.

In 2018 and 2019 we carried out a series of right to work audits across our sites to better understand the risk of labour exploitation and illegal working and to identify the supply chain categories in need of improvement and support. The audits now been incorporated into a programme of random right to work spot checks on our construction sites. We use an external agency to carry out these checks and we have written to our supply chain to inform them that that random checks could happen at any time.

In 2021 we will:

- Work with Stronger Together to complete a detailed review of our systems, processes and operations to understand the next steps we should take to eradicate modern slavery.
- As part of our annual risk and mitigation appraisal, monitor and review our risks and this includes modern slavery.

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TRAINING

To ensure a good level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we developed a bespoke e-learning module in 2017.


We also collaborated with Stronger Together, the CIOB and Surrey County Council in 2017 to produce the "Concrete" video which was filmed on one of our sites. The film seeks to raise awareness of forced labour in the UK and is used throughout the industry for induction and worker training programmes and is publicly available on YouTube.

In 2019/2020 we:

- Updated our modern slavery e-learning module which is mandatory for all our people
- Added a Modern Slavery playlist to our Learning Management System so that our people can access information and links to external sources easily and quickly
- Held a series of additional training workshops for our supply chain in order to provide guidance and support

In 2021 we will complete a full training needs assessment to determine where we can provide further training support to our people, our customers and our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for the financial year ending 31 December 2021 in respect of the companies listed below.



RICK WILLMOTT

Group Chief Executive

Date: March 2021

Hardwicke Investments Limited

Walsworth Limited

Willmott Dixon Holdings Limited

Willmott Dixon Limited

Willmott Dixon Construction Limited

Willmott Dixon Interiors Limited

Be Living Holdings Limited

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