



WILLMOTT DIXON

SINCE 1852

Willmott Dixon Modern Slavery Statement

June 2025

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Introduction

Willmott Dixon is a privately-owned contracting and interior fit-out group operating in the UK, delivering projects for a wide variety of customers in both the public and private sectors.

Willmott Dixon is dedicated to leaving a positive legacy in the communities and environments in which it operates and is committed to acting ethically and with integrity when conducting its business.





Our Business Structure

Willmott Dixon is a privately-owned group founded in 1852. We are a family run business, with executive chairman Rick Willmott being the fifth generation of the family to lead our business.

Our businesses are UK based, with our Head Office in Letchworth Garden City, Hertfordshire. Willmott Dixon principally comprises Willmott Dixon Construction and Willmott Dixon Interiors, together with supporting group functions. Please find more information in our 2024 Annual Report and Accounts.



In 2024, we were awarded a King’s Awards for Enterprise in the category of Sustainable Development – following our success last year in the Promoting Opportunity category.



Willmott Dixon’s ultimate parent company is Hardwicke Investments

Limited ('Hardwicke'). This statement is made in respect of the members of the Hardwicke group of companies listed on page 10 below.

Our purpose is to deliver brilliant buildings, transform lives, strengthen communities, and enhance the environment so our world is fit for future generations. We are dedicated to leaving a positive legacy in our communities and environment. In 2024, we were awarded a King’s Awards for Enterprise in the category of Sustainable Development, which follows our success in the previous year for Promoting Opportunity. Our aim is to create value for customers, stakeholders, and communities by working in a sustainable and responsible way to shape the built environment and make a positive impact to society’s wellbeing.

Our workforce is made up of around 1,900 direct employees and we collaborate with supply chain partner employees and temporary workers daily. As an accredited Real Living Wage (RLW) Recognised Service Provider, Willmott Dixon is committed to ensuring all eligible employees will be paid the RLW, thereby receiving a wage that is above the government minimum.

We have created a Modern Slavery Leadership Group that is responsible for the implementation of Willmott Dixon’s modern slavery policies and procedures and includes Board members (to ensure that there is Board leadership of this issue). The Leadership Group’s scope includes, but is not limited to:

- Assessing modern slavery risks
- Development and ongoing assessment of our KPIs
- Educating our people and supply chain to spot the signs of modern slavery
- Supporting the business with response and remediation.

We are a **Real Living Wage Recognised Service Provider**





Our Policies

We have a number of policies which are designed to manage the risks relating to modern slavery and human trafficking in our business. These policies apply the UN Guiding Principles on Business and Human Rights by confirming our approach to managing the risk of modern slavery and demonstrating our commitment to protecting the human rights of those working within our business and our supply chain.

We are committed to acting ethically and with integrity and to working together with our supply chain to address, and where appropriate tackle, modern slavery and human trafficking. These policies and procedures include:

Anti-Bribery and Corruption Policy, sets out Willmott Dixon’s responsibilities, and those of our people, in observing and upholding our position on bribery and corruption

Anti-Slavery and Human Trafficking Policy, guides our commitment and approach to addressing modern slavery and human trafficking in our business and supply chain, and requires the systems and processes that are designed to mitigate the risk within our operations to be followed

Human Rights Policy, sets out how Willmott Dixon seeks to align strategies and operational activities while respecting human rights

Supplier Code of Conduct, outlines specific standards and responsibilities that our supply chain must adhere to, including Right to Work and Modern Slavery code of conduct

Sustainable Procurement Policy, requires that goods and services be sourced fairly throughout our supply chain, utilising sustainable procurement methods

Whistleblowing Policy, which provides a mechanism for reporting breaches of these policies and is available to our people and our supply chain





Our Supply Chain

The risks relating to modern slavery and human trafficking may arise anywhere in our operations. A significant amount of our business is conducted through our supply chain, which is large and includes consultants, sub-contractors, labour agencies and product and material suppliers. The highly tiered, fragmented, and complex nature of our supply chain means that it is a particular area of focus for us.

We take a proactive approach to managing the risk of modern slavery and labour exploitation happening in our supply chain. This includes conducting risk assessments (that consider factors including the location in which materials are sourced and procured), undertaking due diligence, engaging with our supply chain partners, and collaborating with industry partners.

We have an onboarding process that includes a pre-qualification questionnaire in order to assess suppliers' processes and policies and visits to supplier premises, enabling the delivery of key messages, including modern slavery indicators and the mechanism for raising a concern.

Our group-wide risk assessment, in-line with ISO 20400, identified those parts of our supply chain which appear to be most vulnerable to modern slavery. This assessment has assisted us to develop our processes and controls, which are designed to manage the risk and kept under review.

In 2024, we:



Supported our supply chain to review and implement the outcomes from modern slavery audits carried out in 2023 and 2024

Using the findings from the modern slavery audits, conducted right-to-work audits and ethical employment audits of higher-risk members of our supply chain

Required higher-risk suppliers to undertake training on modern slavery issues (see also "Training")

Promoted our "Right-to-Work: Employer's Guidance" briefing note to support the supply chain on right-to-work checks during recruitment.

In 2025, some of the actions we propose to take are:



Conduct further modern slavery audits within our supply chain

Support our supply chain partners to review and implement the outcomes from the modern slavery audits

Further encourage our supply chain partners to undertake training on modern slavery issues and demonstrate the steps they are taking to manage the risk of modern slavery within their business (see also "Due Diligence")

Encourage higher-risk suppliers to report to us any concerns relating to modern slavery in their own supply chain

Review and monitor our data and KPIs

Continue to assess the potential for forced labour within certain elements of our supply chain.

8 modern slavery audits completed in 2024





Industry Collaboration

For a number of years, we have worked in collaboration with other organisations and industry partners to manage the risks of modern slavery and human trafficking in our supply chain and within our industry.

Willmott Dixon is a founding partner of the Supply Chain Sustainability School, being a member of its Construction Leadership Group and Built Environment Against Slavery group. The latter brings together senior leaders in procurement, supply chain, and sustainability from the built environment industry aiming to drive a common approach to tackling modern slavery and labour exploitation.

We are signatories of the Gangmasters and Labour Abuse Authority's (GLAA) Construction Protocol and the Worker Protection Commitment from CCLA Investment Management and the Cabinet Office, through which we collaborate with others to protect vulnerable workers and raise awareness of ways of managing the risk of modern slavery within the industry.

In 2024, we:



Reviewed, identified and used the findings from the ethical audits undertaken in connection with our business to inform and support the wider construction sector

Contributed to the Supply Chain Sustainability School's Built Environment Against Slavery group

Delivered a "Due Diligence Case Study" webinar through the Supply Chain Sustainability School, in collaboration with one of our supply chain partners. Available here: <https://www.willmottdixon.co.uk/modernslavery>

Formed a working group with other main contractors to explore the potential introduction of a "Modern Slavery Intelligence Network" in the construction industry, following the success in the agricultural industry

Hosted a cycle on Anti-Slavery Day in collaboration with Ride for Freedom, a non-profit organisation, to raise awareness and funds for victims of modern slavery.

In 2025, some of the actions we propose to take are:



Deliver external training in collaboration with the Supply Chain Sustainability School to highlight techniques for identifying, and mitigating, key modern slavery risks in the construction industry

Continue to explore, in conjunction with other industry participants, ways to further develop our procedures to manage the risk of modern slavery and human trafficking

Continue to explore, in conjunction with other industry participants, ways to further manage the risk of modern slavery and human trafficking across the construction industry.





Due Diligence

We enter into written agreements with members of our supply chain that require them to comply with the Modern Slavery Act 2015 and our Modern Slavery Policy (including rights to audit).

We have:

- An internal team that manages our supply chain and engages with it in relation to modern slavery compliance
- Together with Unseen (the modern slavery charity) trained senior managers, who act as regional points of escalation, on modern slavery concerns that may arise from our supply chain (see also “Training”)
- Provided guidance about modern slavery and right-to-work requirements, for example checklists and training videos to outline the supply chain’s responsibilities under the relevant legislation.

To enable us to monitor compliance, we use an external auditor to conduct both announced and unannounced ethical audits on our projects and supply chain to evaluate the risk of labour exploitation and identify the higher-risk areas of our supply chain.

We have implemented a programme of spot checks on our sites following the audits, and we work with our supply chain on any feedback.

In 2024, we:



Assessed our performance against the Government’s risk identification and management Modern Slavery Assessment Tool (MSAT) achieving 89%

Reviewed and updated our Modern Slavery Policy

Updated our project site access system to include further modern slavery risk mitigations

Had our publicly available modern slavery policies and procedures reviewed by CCLA Investment Management and signed their worker protection commitments (see also “Industry Collaboration”)

Reviewed our response plan, and working with Unseen, trained relevant operational roles on the steps to be taken following an instance of potential modern slavery.

In 2025, some of the actions we propose to take are:



Continue to train relevant operational roles on the steps to be taken following an instance of potential modern slavery

Collect data about our supply chain’s approach to tackling modern slavery

Continue to review our internal policies and procedures to ensure that they clearly set-out our requirements for both our people and our supply chain.





Training

We have developed e-learning modules for both our people and supply chain which are designed to raise awareness of the risk of modern slavery and human trafficking in our supply chain and our business.

In addition, we have created other learning materials that are publicly available and aim to raise awareness of modern slavery for the wider industry.

In 2024, we:



Delivered our own modern slavery "Learning Pathway" through the Supply Chain Sustainability School and required our higher-risk supply chain partners to complete it

Worked with Unseen to deliver 'modern slavery response' training to senior managers within the business who act as regional points of escalation for modern slavery concerns that may arise from our people and supply chain (see also "Due Diligence")

Delivered 'Toolbox Talks' to those working on our sites to help them to identify the signs of, and respond to, potential modern slavery.

In 2025, some of the actions we propose to undertake are:



Continue to roll-out modern slavery training within the business

Continue to drive the requirement that higher-risk suppliers undertake training, including at senior management level

Further encourage our supply chain partners to undertake training on modern slavery issues (see also "Our Supply Chain")

Review and, where appropriate, update our reporting on the monitoring of the training performance of our people and the supply chain.





Sign-Off

This statement was approved by the Board of Directors of Hardwicke Investments Limited, 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 ended 31 December 2024 in respect of the companies listed below.

For and on behalf of the Board of Directors of Hardwicke Investments Limited:

Graham Dundas
Chief Executive Officer

Date: June 2025

Hardwicke Investments Limited
Walsworth Limited
Willmott Dixon Holdings Limited
Willmott Dixon Limited
Willmott Dixon Construction Limited
Willmott Dixon Interiors Limited





WILLMOTT DIXON

SINCE 1852

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