



WILLMOTT DIXON

SINCE 1852

Willmott Dixon Modern Slavery Statement

April 2026





Contents

- > Introduction
- > Our Business Structure
- > Our Policies
- > Our Supply Chain
- > Industry Collaboration
- > Due Diligence
- > Training
- > Sign-Off





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 2025 Annual Report and Accounts.



We are proud winners of the King’s Awards for Enterprise in the Sustainable Development – and Promoting Opportunity categories.



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. We are proud winners of the King’s Awards for Enterprise in the Sustainable Development and Promoting Opportunity categories. 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.

Modern Slavery 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 suppliers' 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.

Alongside this, we remain committed to creating positive social impact by working with local skills and resources to deliver our projects. We actively support businesses of all sizes, helping SMEs, VCSEs and diverse suppliers collaborate with us and begin their journey working with Willmott Dixon.

In 2025, we:



- Conducted ethical employment audits of higher risk members of our supply chain.
- Conducted right-to-work audits of higher risk members of our supply chain.
- Saw 90% of our active preferred suppliers complete modern slavery training (see also "Training").
- Piloted a new approach for collecting data from our supply chain to demonstrate the measures they are taking to prevent modern slavery within their own operations.
- Promoted our "Right-to-Work: Employer's Guidance" briefing note to support the supply chain on right-to-work checks during recruitment.

In 2026, 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 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, including building a dedicated supply chain performance dashboard to track supply chain related KPIs.
- Continue to assess the potential for forced labour within higher risk categories of our supply chain.

90% of our active preferred suppliers have completed modern slavery training





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 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, the Worker Protection Commitment from the Cabinet Office and CCLA Investment Management, 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 2025, we:



- Contributed to the Supply Chain Sustainability School's Built Environment Against Slavery Group.
- Supported the development of the Supply Chain Sustainability School's Modern Slavery Due Diligence Assessment.
- Formed an external working group with the Supply Chain Sustainability School and industry participants to assess and address modern slavery risks within the solar PV supply chain, in response to increasing pressure across the industry.
- Hosted a series of workshops that brought together industry experts to help shape the next stage of our sustainability strategy, with a focus on responsible sourcing, ethical labour, and key risk areas within our supply chain.

In 2026, some of the actions we propose to take are:



- Produce and publish a series of fact sheets that support the ethical sourcing of renewable products, including solar panels, in collaboration with the Supply Chain Sustainability School's external working group.
- Implement the outcomes from the industry workshops to shape the next phase of our sustainability strategy.
- 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.
- Trained senior managers (with Unseen, the modern slavery charity), 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 2025, we:



- Assessed our performance against the Government's risk identification and management Modern Slavery Assessment Tool (MSAT) achieving 89%.
- Reviewed and updated our Sustainable Procurement Policy, which includes provisions on ethical labour and responsible sourcing.
- Conducted right-to-work audits of our sites, sampling all individuals present.
- Formed a working group to address supply chain visibility risks, including responsible sourcing and modern slavery.

In 2026, 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 managing the risk of modern slavery within their business.
- 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.
- Test the effectiveness of our policies and procedures.
- Pilot solutions to risks identified in risk review.





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 2025, we:



- Delivered our own modern slavery "Learning Pathway" through the Supply Chain Sustainability School, requiring all preferred suppliers to complete it, achieving a 90% completion rate.
- Required all new starters to complete modern slavery training as part of their onboarding.
- Built modern slavery training into our sustainability dashboard, which is reported to the Board, ensuring it is tracked as a visible KPI.

In 2026, 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 all preferred suppliers undertake training, including at senior management level (see also "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 2025 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: April 2026

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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