



## **WILLMOTT DIXON GROUP'S SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **FOR FINANCIAL YEAR ENDING 31 DECEMBER 2017**

#### **INTRODUCTION FROM THE GROUP CHIEF EXECUTIVE**

We are a privately owned group of companies which is one of the largest in the UK specialising in construction and property sectors and we are committed to acting ethically and with integrity in all our business dealings and relationships. We recognise that modern slavery exists within every sector and supply chain and that this is not a victimless crime. We are therefore proactively implementing processes and procedures within our business to ensure that modern slavery, human trafficking and forced labour are not taking place anywhere within our own group of companies or in any of our supply chains. As part of our commitment to tackling modern slavery and ensuring transparency throughout our supply chain we have published our Modern Slavery Policy on our website [here](#).

It is estimated that there are approximately 10,000 to 13,000 people currently affected by modern slavery in the UK today and it is the fastest growing criminal industry in the world. We recognise that our businesses operate within a sector which is particularly vulnerable to forced labour and modern slavery offences. We are therefore mindful of our role, in helping to prevent hidden labour exploitation.

Our values are strongly focused on people and relationships and our group vision statement emphasises our commitment to sustainability. Our approach to tackling modern slavery builds upon our core vision and values and in this modern slavery statement we have set out the steps we are taking to minimise the risks to our business and within our supply chains.

Our success relies upon our relationships with our supply chain and our approach is to build strong, open and positive relationships with suppliers and providers who share our values, and to make them an integral part of our business. Making our supply chain a reflection of our business is one of our key aims and therefore our approach to modern slavery is intrinsically linked to the success of our company. As part of our planned actions for 2018, we will continue to keep under close review the effectiveness of our Modern Slavery Policy and the processes and procedures outlined in this statement.

#### **INDUSTRY COLLABORATION**

We understand that there is a clear moral case for eliminating modern slavery and human rights offences. As a major contractor we take our responsibility for tackling modern slavery and improving the construction sector's reputation seriously. We acknowledge the need to take a collaborative approach with our industry peers and in 2017 we became one of the founding project sponsors of the joint CIOB and Stronger Together multi-stakeholder initiative to tackle modern slavery in the construction sector.

In 2017 we also signed up to the Gangmasters and Labour Abuse Authority's 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.

## GROUP STRUCTURE AND SUPPLY CHAINS

The Willmott Dixon Group of companies is a privately-owned group of construction and property companies principally engaged in public and commercial contracting, residential development and property support services (referred to throughout this statement as the "Group").

The Group operates with its headquarters in Letchworth Garden City and has over 3,000 employees. Its business solely operates within the UK. The Group is organised into three sister trading companies each with its own business units. A chart illustrating the Group's structure can be found on our website [here](#).

The Group is a key member of the Home Office Advisory Group on Migrant Status and RTW checks and also the Supply Chain Sustainability School Construction Leadership Group which enables us to keep abreast of legislative requirements and issues within the construction industry. We are one of the founding partners of the Supply Chain Sustainability School as we recognise the need to take a common approach to address sustainability within our supply chains. We are now building on this collaborative approach to tackle modern slavery, forced labour and other human rights issues which are prevalent within our industry.

The Group's supply chain is considerable and covers contractors, consultants, labour agencies, product and material suppliers, service providers, joint venture partners and our clients.

## OUR POLICIES, STRATEGY AND GOVERNANCE

We recognise our moral and ethical responsibilities to do all that we can to ensure that our business and supply chain is slavery free. In 2016 we established a working party representing the Group to focus on the risks presented by modern slavery to our Group and our supply chain. Over the last 2 years, the MSA Working Party has been instrumental in developing and implementing processes and procedures to tackle modern slavery and forced labour practices and it continues to progress further initiatives identified in this statement.

Along with our Modern Slavery Policy, we have a number of other corporate policies setting out the Group's commitment to sustainability, sustainable procurement, social value, the environment and business ethics we are available to view on our [here](#).

We also have in place a number of internal Group policies including Whistleblowing, Anti-Bribery, Employee Code of Ethics, Equality and Diversity, Competition, Dignity at Work, Human Rights, Recruitment Policy and Employee Vetting (Anti-Blacklisting). We continuously take a due diligence approach and review of our policies to ensure that they contain appropriate provisions related to tackling modern slavery where required.

We recognise that our success depends on the skill, knowledge, integrity and commitment of our employees and we put our employees at the heart of our business and aim to provide a happy, healthy and safe working environment. If our employees have genuine concerns regarding any suspected wrongdoing or danger at work, including suspected slavery or labour exploitation, then employees are encouraged to raise their

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concerns in accordance with our Group Whistleblowing Policy or our Modern Slavery Policy. These policies provide guidance on how to raise concerns and how the business will investigate and deal with such concerns appropriately without any fear of reprisal on the part of the employee.

Delivering social value is at the heart of our businesses. As part of our planned actions for 2017, we intend to further develop our strategies to support and provide opportunities to vulnerable people. We work closely with our supply chain partners to deliver this through focused engagement and intervention.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

At the start of our journey we undertook a risk mapping exercise to identify those areas within our businesses and our supply chains most vulnerable to modern slavery practices. Having identified high risk areas, we began the process of developing and implementing various actions to mitigate the risks identified in this statement. We continue to reassess our risk areas and through our MSA Working Group we undertake an ongoing due diligence process both internally and by utilising the knowledge gained via our involvement with Stronger Together and the GLAA Construction Protocol.

We investigate the transparency of our labour force working directly for us and in subsequent supply chain tiers. We have devised our 'Ensuring Right to Work' process which we use to carry out appropriate checks for all prospective new employees. This process has been made available to our supply chain partners along with 'Right to Work' videos that we created in conjunction with the CITB. These were developed as guidance for our supply chain partners to ensure they complete appropriate checks for their workforce. In addition, our recruitment policy and policy on human rights together set out our minimum standards for recruitment, including: freedom of association; elimination of forced labour; elimination of discrimination in respect of employment and occupation and ensuring we are not complicit in human rights abuses.

During 2018 In order to map risks and opportunities across our supply chains in support of our Sustainable Procurement Policy, we are coordinating an exercise, to evaluate our key supply chain categories against a series of sustainability related issues material to our businesses (such as climate change, waste, gender diversity and skills gaps). Labour exploitation will be included within this exercise in order to identify hotspots of risk.

## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We expect our supply chain partners to comply with our values and ethics through early engagement and collaboration. We have strategic working relationships with our top tier supply chain partners with whom we spend 80% of our turnover. We procure goods and services in line with our Sustainable Procurement Policy and require our supply chain to do the same.

Our Sustainable Procurement Policy Statement, to which our supply chain must adhere, outlines how we will influence procurement choices of goods, works and services. It aims to ensure that fair contract prices and terms are applied and respected, and that ethical,

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human rights and labour standards are met, in line with our Modern Slavery Policy and the United Nations Global Compact principles.

As part of our supply chain engagement process we have updated our contract documents to include legal obligations to comply with the Modern Slavery Act and our policy. These are used throughout our Group when contracting with any part of our supply chain.

We are supporting our supply chain partners by providing them with advice and guidance with regards to the 'Right to Work' process. In particular, we created training videos (sponsored by the CITB) which have been sent to our supply chain partners alongside a letter from our Group Chief Executive. The letter outlined their responsibilities under the Modern Slavery Act and the Immigration Act; however in order to provide them with support it also contained written guidance, Right to Work checklists and signposts to further information.

We are a founding member of the Supply Chain Sustainability School which provides free training and resources for construction industry suppliers. We encourage our Supply Chain Partners to sign up to the School and our National Supply Chain Manager has been working with the Sustainability School to create modern slavery materials and workshops to ensure suppliers are supported and know what is required of them.

During 2018, we intend to provide further guidance and support to all our employees and Supply Chain Partners to raise awareness of modern slavery and human trafficking in the construction industry. This will include a poster campaign in all our offices and sites giving information about our Modern Slavery Policy. We are also investing the possibility of providing a telephone helpline and online App for anyone to report concerns or incidents on an anonymous basis.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have developed a bespoke online training course. The training course is currently being rolled out to all our employees and new starters. The training module is aimed at raising awareness of modern slavery and human rights abuses in the UK and particularly within the construction sector. It also outlines the steps we are taking as a business to tackle the issues and warning signs people should be looking out for and what to do/who to contact if they have concerns about modern slavery anywhere in our supply chain.

During the course of 2018 we will be looking at ways in which we can provide training resources to our top tier supply chain partners. This may involve modifying our own online training course and making it available to our supply chain. We are also currently in discussions with Stronger Together regarding the interactive training workshop it has developed and which a number of our MSA Working Group members have attended. We are aiming to promote the workshop our supply chain.

We 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 was made using actors who portrayed a true story of polish nationals who were found to be held in slavery on a UK construction site. The film seeks to raise awareness of forced labour in

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the UK and is used throughout the industry for induction and worker training programmes. It is made publically available on YouTube.

During 2018 we intend to develop an in-depth training programme for those within our business who work on and have control of our sites around the country. The training is intended to provide more in-depth knowledge of spotting the signs of forced labour and slavery, how to deal with any such concerns and what to do in the event that such a person or persons are found on our sites.

### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

Our MSA Working Group is currently undertaking an assessment of how the Group can successfully monitor and undertake audit checks throughout our business and supply chain to help us monitor compliance with our Modern Slavery Policy and to identify any potential and actual breaches.

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 2016 in respect of the companies listed in Appendix 1.



**RICK WILLMOTT**

Date: 11 April 2018

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**APPENDIX 1**

Willmott Dixon Holdings Limited

Willmott Dixon Public & Commercial Limited

Willmott Dixon Construction Limited

Willmott Dixon Interiors Limited

Willmott Dixon Rethinking Limited

*Handwritten notes:*  
The Willmott Dixon  
Group  
is a listed company

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