



WILLMOTT DIXON GROUP'S SLAVERY AND HUMAN TRAFFICKING STATEMENT

FOR FINANCIAL YEAR ENDING 31 DECEMBER 2016

INTRODUCTION FROM THE GROUP CHIEF EXECUTIVE

We are a privately owned 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 2017, we will continue to keep under close review the effectiveness of our Modern Slavery Policy and the processes and procedures outlined in this statement.

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 working 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. To this end, we have put in place a working party representing the Group to focus on the risks presented by modern slavery. The MSA Working Party has responsibility for developing and implementing the processes and procedures outlined 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 Principles and Employee Vetting (Anti-Blacklisting). During 2017, as part of our planned actions, we intend to undertake a due diligence approach and review of all our policies to ensure that they contain appropriate provisions related to tackling modern slavery.

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 concerns in accordance with our Group Whistleblowing Policy. This policy provides 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.

Social value is at the heart of strategic innovation across the Group. As part of our planned actions for 2017, we intend to further develop our strategy to incorporate our commitments and strategies to tackle modern slavery in the construction sector and within our supply chain.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As well as the due diligence for our internal policies and practices, we have undertaken 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 are now in the process of developing and implementing various actions to mitigate these risks as identified in this statement.

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Slavery & Human Trafficking Statement	LR028	Justine Brazil (General Counsel)	1.1	31 st March 2017

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 and to ensure that appropriate checks for the workforce on site are carried out. In addition, our recruitment principles 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.

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 expect 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, 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 are working with the CITB to produce training videos which will be accessible to our supply chain partners. We have also created Right to Work checklists specifically for use by our supply chain. As part of our planned actions for 2017 we will be issuing the written guidance and the Right to Work checklists to our supply chain partners and circulating the training videos.

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 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 2017, 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 Whistleblowing 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

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To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are in the process of developing a bespoke online training course. As part of our planned actions for 2017 this will be rolled out to all our employees and new starters during the spring. 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 will also outline 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 2017 we will be looking to modify the training course so that we can also offer this specific modern slavery and human trafficking online resource to our top tier supply chain partners.

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. As part of this assessment, during 2017 we will be investigating how we can incorporate monitoring and audit checks into our Group Risk Management System.

During the course of this year, we intend to sign up to the Ethical Labour Standard developed by the BRE to assist our business to verify the systems and processes we are putting into place to tackle modern slavery and to assist us in continuously improving our ethical labour sourcing practices.

We understand that there is a clear moral case for eliminating modern slavery and human rights offences due to the criminal nature of the exploitation of individuals and also due to the damaging effect such crimes may have on the reputational risk and stakeholder support of our business. 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 with this in mind, we have committed to become a project sponsor of the joint CIOB and Stronger Together multi-stakeholder initiative in the construction sector.

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: March 2017

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APPENDIX 1

Be: Here Limited
Fortem Energy Services Limited
Fortem Solutions Limited
Fortem 4Life Limited
Hardwicke Limited
Prime Place Developments Limited¹
Willmott Dixon Construction Limited
Willmott Dixon Holdings Limited
Willmott Dixon Interiors Limited
Willmott Dixon Public & Commercial Limited
Willmott Partnership Homes Limited
Willmott Regeneration Limited²
Willmott Dixon Rethinking Limited
Willmott Residential Limited³
Wimpole Equity Holdings Limited

ADDENDUM

¹ On 03 May 2017 Prime Place Developments Limited changed its registered name to Be Living Limited

² On 03 May 2017 Willmott Regeneration Limited changed its registered name to Be Living Group Limited

³ On 03 May 2017 Willmott Residential Limited changed its registered name to Be Living Holdings Limited

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