

**SLAVERY AND HUMAN TRAFFICKING STATEMENT**  
**FOR FINANCIAL YEAR ENDING 31 DECEMBER 2018**

**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 construction projects. 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 construction sector and we are proactively implementing processes and procedures within our business to tackle it. Our values (which can be found on our website) 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 and fragmented nature of our construction supply chain 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.

In 2018, to better understand the risks within our supply chains we undertook a risk mapping exercise, in-line with ISO 20400, to identify those areas most vulnerable to modern slavery practices and those trades identified as the greatest risk has guided the interventions and processes undertaken to date and to be undertaken in the future.

**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 our supply chain partners to access free resources including regional training workshops, 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.

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Willmott Dixon is a key member of the Home Office Advisory Group on Migrant Status and 'Right to Work' (RTW) 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 2018 we:

- Worked with Stronger Together and its construction group to develop and deliver modern slavery workshops which are available to all construction businesses;
- Hosted members of the GLAA at our projects to give them an insight as to how we operate;
- Supported the Supply Chain Sustainability School in developing minimum labour standards for the construction industry.

## **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 our website and have been largely updated in 2018. They demonstrate a consistent approach to our people, our supply chain's people, their collective safety and zero tolerance to modern slavery.

In 2019 we will:

- Make updates to our Modern Slavery Policy, our Statement on Human Rights and our 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;
- Update our supply chain contract documents with a code of conduct to make the obligations that we place on our supply chain clearer and ensure they are aware of their compliance requirements.

## **DUE DILIGENCE PROCESSES FOR SLAVERY 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 RTW 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 2018 we carried out a series of RTW audits across our sites to better understand the risk of labour exploitation and illegal working. The audit findings gave us a better understanding of the risks of potential illegal practices, demographic trends and supply chain categories in need of improvement and support.

We also included a series of compulsory questions on modern slavery and compliance with the Modern Slavery Act within our works partner pre-qualification system in 2018 to improve our vetting and understanding of our supply chain and will keep these procedures under review in 2019.

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In 2019 we will implement further site audits, to understand our suppliers' compliance with RTW requirements and modern slavery laws. We will also be linking together our online pre-enrolment system (used to induct people to our sites before they arrive) and our site access control systems to better monitor and control who is on our sites.

## **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 publically available on YouTube.

In 2018 we:

- Included modern slavery as one of our prominent themes within our group-wide sustainability conference;
- Made our modern slavery e-learning module mandatory for all our people and it included it as a compulsory module for all new starters;
- Held six additional training workshops for our supply chain in order to provide guidance and support.

In 2019 we will:

- Hold a series of detailed training workshops, with our partners Stronger Together, for our people and our supply chain on tackling modern slavery. The workshops will focus on those supply chain categories identified as representing the greatest risk of labour exploitation.

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 2018 in respect of the companies listed below



**RICK WILLMOTT**  
Group Chief Executive

Date: 11 April 2019

This statement sets out the steps taken by Willmott Dixon Holdings Limited (00198032), Willmott Dixon Public & Commercial Limited (05922246), Willmott Dixon Construction Limited (00768173), Willmott Dixon Interiors Limited (04118020) and Be Living Holdings Limited (04208738), Hardwicke Investments Limited (06454113), Walsworth Limited (03421224), all of which fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act (Transparency in Supply Chains) Regulations 2015. Although not subject to reporting requirements, all other subsidiaries which have not otherwise provided a statement support and embrace the same approach.

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