

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **FOR FINANCIAL YEAR ENDING 31 DECEMBER 2022**

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

Willmott Dixon Holdings Limited is a national contracting and interior fit-out business operating in the UK which delivers substantial capital projects for a wide variety of customers in both public and private sectors. Willmott Dixon is dedicated to leaving a positive legacy in the communities and environment in which it operates and is committed to acting ethically and with integrity in its business dealings.

We have been implementing procedures and training within our business and across our supply chain to raise awareness of potential modern slavery issues in order to be able to identify and address the problem if it were identified. We have set out plans for the coming year to continue this work. Our values 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 and joint venture partners, ranges from highly-skilled professionals to semi-skilled labour and includes both large and small businesses. The highly-tiered, fragmented and global nature of our construction supply chain means that it is a significant focus for our modern slavery policy.

To better understand the risks within our supply chains we have undertaken a risk mapping exercise, in-line with ISO 20400, to identify those areas which appear to be most vulnerable to modern slavery. This has guided the interventions and processes we have put in place to date and will continue to inform our future plans.

We believe that we have made significant improvements in mitigating the risk of modern slavery being present within our supply chain or on our sites but understand that there will always be scope for improvements.

Our next phase in combatting the risk of modern slavery in the UK construction market, and particularly our business, will be to focus on our interaction with, support of and guidance to our goods supply chain partners.

In 2021 we:

- Continued to use labour agencies with strong and robust anti-slavery, labour exploitation and right to work processes in place
- Communicated guidance to our supply chain partners on their responsibilities under the Right to Work Act, what processes they need in place and what questions to ask when engaging labour agencies
- Became a Real Living Wage Employer and communicated this commitment to our supply chain
- Increased the proportion of our sites actively using biometric turnstile access systems to improve transparency of who is on our sites<sup>1</sup>

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<sup>1</sup> Fingerprint recognition systems deactivated during pandemic

- Adopted new non-touch biometric access control systems in response to the Covid-19 pandemic
- Reviewed our strategic goods partners compliance with our Sustainable Procurement Policy including requirements to tackle modern slavery and publish a modern slavery statement

In 2022 we will:

- Review and update our site pre-enrolment system and include key messages on tackling modern slavery, spotting the signs and what to do if someone sees something that doesn't look right
- Continue to require that our preferred suppliers in the most 'at risk' categories of our supply chain commit to undertake training, at senior management level, on tackling modern slavery
- Work to ensure all those who work regularly on our sites (directly employed or with our supply chain) will be paid the Real Living Wage

## INDUSTRY COLLABORATION

We recognise the importance of working together for the benefit of the industry.

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. Our sponsorship enables anyone to access free resources on how to address the risk of modern slavery, including 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 aims to establish 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.

Willmott Dixon is a key member of the Home Office Advisory Group on Migrant Status and Right To Work checks as well as a founding partner of the Supply Chain Sustainability School. We remain an active member of the School's Construction Leadership Group and have signed up to their People Charter which sets minimum labour standards for the construction sector.

In 2021 we:

- Worked with Stronger Together to adapt its modern slavery workshops during the COVID-19 pandemic in order to continue training people in our business and our supply chain
- Supported the development of the Supply Chain Sustainability School's Learning Management System enabling greater access to free training on modern slavery
- Worked with other members of the Stronger Together Construction steering group to develop a methodology for conducting ethical labour supply chain audits in the construction sector
- Joined the Scape ethical labour group to set minimum standards for contractors and their supply chains
- Contributed to the Independent Anti-Slavery Commissioner's construction sector review

In 2022 we will continue to work closely with these organisations to raise the performance of our sector and share lessons learnt with the wider industry.

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Slavery & Human Trafficking Statement	LR028	Michael Cross	1	March 2022

## OUR POLICIES, STRATEGY AND GOVERNANCE

Along with our Modern Slavery Policy, we have a number of other related corporate policies which set out our commitment to eradicating modern slavery. They demonstrate a consistent approach to our people, our supply chain's people, their collective safety and zero tolerance to modern slavery.

In 2022 we will Review and update our Sustainable Procurement Policy and Modern Slavery Policy.

## DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY RISK 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 'Right to Work' process. 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 available to our suppliers and our people. We periodically re-issued the videos to our supply chain to ensure they remain aware of their obligations.

We have carried out a series of right to work audits across our sites to better understand the risk of labour exploitation and illegal working and to identify the supply chain categories in need of improvement and support. The audits have now been incorporated into a programme of random right to work spot checks on our construction sites. We use an external agency to carry out these checks and we have written to our supply chain to inform them that random checks could happen at any time.

In 2022 we will:

- Work with Stronger Together to complete a detailed review of our systems, processes and operations to understand the next steps we should take to eradicate modern slavery
- Complete a series of in-depth ethical labour audits with key supply chain partners to better understand their risk management processes and actions to address the risk of modern slavery

## 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 mandatory, bespoke e-learning module. We intend to review and update this training in 2022.

We also collaborated with Stronger Together, the CIOB and Surrey County Council 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 publicly available on YouTube.

In 2021 we:

- Updated our Modern Slavery playlist to our Learning Management System so that our people can access information and links to external sources easily and quickly

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- Required a number of our higher risk supply chain partners to attend the Stronger Together's Tackling Modern Slavery workshop, free of charge
- Completed a training needs assessment for key roles, so as to identify additional learning for our people to help them to identify modern slavery issues

In 2022 we will update our modern slavery e-learning module which is mandatory for all our people and develop new training for our people where it is needed.

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 2021 in respect of the companies listed below.

**RICK WILLMOTT**  
Group Chief Executive

Date: March 2022

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

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