

STANDARDS to be met: UK Legislation, Company Law & ISO 9001:2015

1 Company Policy For Risk Management

It is the policy of Willmott Dixon Holdings (referred to as "Group") to:

- a) Safeguard the Group's activities for all stakeholders and property affected by its processes and works, to provide, so far as is reasonably practicable, visibility and mitigation of associated organisational and operational risks.
- b) Conduct its undertakings in such a way as to ensure, so far as is reasonably practicable, that it is not affected, or exposed to unaccounted for risk during the works, as well as, mitigate impact from and ensure business resilience to forecasted changes/extremes.
- c) Recognise its obligations to comply with all relevant all business legislative requirements which apply to any aspects of the organisation's undertakings, as well as commitments that, in the absence of legislation, adopt good practice as Compliance Obligations.
- d) Organise and arrange its affairs to provide compliance with, and commit to, continual improvement of the Policy, including control and influence of value chain stakeholders.
- e) Undertake management reviews of this Policy and the associated Risk Management System (RMS), which provides the framework for principle Management Systems, such as Occupational Health, Safety and Environmental. Periodically taking action if necessary to ensure its effectiveness and compliance with changes in the nature of the Groups operations, structure, legislation, best practice and procedures.

2 Scope of the System

The scope of the quality (risk) management system (and associated integrated risk systems) is defined as the management of construction projects, including the construction of residential and associated buildings for private and public organisations. Those directors responsible for risk management and their defined areas of operation are listed in RMS-RM-051. The scope will include delivery of products and services through the design, fit-out and refurbishment within office, retail, hotel, leisure, residential and other emerging markets, in both public and private sectors. The scope includes activities as a principle designer, designer, principle contractor and contractor.

3 Operation of the Policy

In carrying out the General Policy Statement it is the practice of Willmott Dixon Group to:

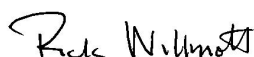
- a) Maintain an active interest in the implementation of the Company Policy for RMS to ensure that all levels of management carry out their duties in this respect.
- b) Ensure that the managerial responsibility and accountability for Risk Management of its employees are specified in writing.
- c) Ensure that competent resource with discipline specific and appropriate training and instruction is provided, and that prevention is included in all relevant discipline specific training programmes. Investigate and ensure learning from all incidents/non-conformances.
- d) Prepare, discuss, agree and review suitable amendments to the Company Policy for Risk Management, as considered necessary.
- e) Monitor performance and trends through the annual Management Review to set objectives, for continued improvement, with the SHE Steering Group.
- f) Ensure that this Policy is applied to all contracts, so far as is reasonably practicable.

4 **Organisation of the Policy**

- a) The responsibility for all matters relating to Risk Management within the Group rests with the Group Chief Executive.
- b) The responsibility for all matters relating to Risk Management within each Company rests with the respective Chief Operating Officer (COO).
- c) The Managing Director of each LCO is responsible to the COO of each Company within the Group structure for all matters relating to Risk Management within their LCO (See RMS-RM-052).

5 **Arrangements for the Policy**

- a) Each LCO will inform all its employees of their responsibilities, including to:
 - o comply with Risk Management legislation and obligations
 - o plan effectively for risk conditions that may affect delivery of services or products for their customers
 - o promote practices that will reduce risks
 - o plan to deliver objectives that secure performance with continued improvement
- b) The appointed Systems Managers will inspect, monitor and report on the effectiveness of the Risk Management application and practices of all LCO's and will, where necessary, enforce the Policy by imposing Corrective Action Plans.
- c) The appointed Group Compliance Manager (GCM) will complete 2nd party audits to inspect, monitor and report on the effectiveness of the Group Risk Management Policies in detail and practices of all LCO's.
- d) Management review of the policy and performance, as well as continued improvement of the system, will be made by the Health, Safety and Environmental Steering Group, with cascade of performance action and continual improvements required led by the directors responsible for risk management.



Rick Willmott
Group Chief Executive (GCE)

Group Director Responsible for Risk Management
WILLMOTT DIXON HOLDINGS LIMITED

RMS- OTHER RELEVANT DOCUMENTS

- RM-051 Leaders Responsible for Risk and Opportunities Management**
- RM-052 Organisational Structure for Risk and Opportunities Management**
- PO-011 Group Risk Management Policy (for display)**
- RM-041 Needs & Expectations of Interested Parties (NEIPs) Assessment**
- RM-042 Political, Economic, Social, Technological, Legal & Environmental (PESTLE) Analysis**
- RM-043 Sustainable Development Risks and Opportunities Assessment**
- RM-044 Value Chain Influence and Control**