

Willmott Dixon Holdings Limited ("Willmott Dixon")
Modern Slavery Act 2015 Statement
March 2023

Introduction

Willmott Dixon heads a national contracting and interior fit-out group operating in the UK, delivering projects for a wide variety of customers in both the public and private sectors.

Willmott Dixon is dedicated to leaving a positive legacy in the communities and environments in which it operates and is committed to acting ethically and with integrity when conducting its business.

Our Policies

We have a number of policies which are designed to manage the risks relating to modern slavery and human trafficking in our business, including our Anti-Slavery and Human Trafficking Policy, our Whistleblowing Policy, and our Sustainable Procurement Policy. These policies confirm our approach to managing the risk of modern slavery and demonstrate our commitment to protecting the human rights of those working within our business and our supply-chain. Our Whistleblowing Policy provides a mechanism for reporting breaches of these policies.

Our Supply Chain

The risks relating to modern slavery and human trafficking may arise anywhere in our operations. A significant amount of our business is conducted through our supply-chain, which is large and includes consultants, sub-contractors, labour agencies and product and material suppliers. The highly tiered, fragmented, and complex nature of our supply-chain means that it is a particular area of focus for us.

We undertook a risk assessment, in-line with ISO 20400, to identify those parts of our supply-chain which appear to be most vulnerable to modern slavery. This assessment assisted us to develop our processes which are designed to manage the risk, which we keep under review.

In 2022, we:

- Together with an external adviser, conducted ethical labour audits of certain members of our supply-chain (see also "Industry Collaboration")
- Within our site pre-enrolment process, raised awareness of identifying potential modern slavery issues
- Assessed the potential for forced labour in the higher-risk parts of our supply-chain.

In 2023, some of the actions we propose to take are:

- Conduct further modern slavery audits within our supply-chain
- Continue to drive the requirement that higher-risk suppliers undertake training, at senior management level, on modern slavery issues
- Continue to assess the potential for forced labour within certain elements of our supply-chain.

Industry Collaboration

We recognise the importance of working together with other organisations to manage the risks of modern slavery and human trafficking within the industry.

We are a founding sponsor of the construction programme run by "Stronger Together", which works with businesses to raise awareness of, and manage, the risks of modern slavery in our sector.

We are also a signatory of the Gangmasters and Labour Abuse Authority's (GLAA) Construction Protocol, whose signatories are committed to working together to protect vulnerable workers, share information to prevent exploitation and raise awareness of ways of managing the risk of modern slavery and human trafficking within the industry.

Willmott Dixon is a member of the Home Office's Advisory Group on Migrant Status and Right-to-Work checks and a founding partner of the Supply Chain Sustainability School, being a member of its Construction Leadership Group. We have signed the School's "People Charter", which aims to create a single set of standards for the construction sector.

In 2022, we:

- Worked with other members of Stronger Together to develop an ethical labour audit methodology and audited certain members of our supply-chain in accordance with this methodology
- Contributed to the "Ethical Labour Group" established by a major public sector framework provider which set minimum compliance standards for contractors and their supply-chains
- Supported a major customer with research projects to assist our and its understanding of attitudes towards modern slavery.

In 2023, some of the actions we propose to take are:

- Review and identify common findings from the ethical labour audits carried out in 2022 (please see above), in collaboration with other Stronger Together members
- Together with other Stronger Together members, develop a case study based on the findings from these audits, which is designed to develop levels of awareness of the issues within the industry
- Continue to explore, in conjunction with other industry participants where appropriate, ways to further develop our procedures to manage the risk of modern slavery and human trafficking.

Due Diligence

Agreements with members of our supply-chain require them to comply with the Modern Slavery Act 2015 and our Modern Slavery Policy.

We provide our supply-chain partners with guidance about "right-to-work" requirements, for example by providing them with training videos to outline their responsibilities under the relevant legislation.

We have carried out right-to-work audits across certain of our projects to assess the risk of labour exploitation and identify those higher-risk parts of the supply-chain. Following the audits, we have set-up a programme of spot checks on our sites, using an external agency.

In 2022, we:

- Worked with Stronger Together to conduct a review of our systems, policies and procedures which are designed to manage the risks of modern slavery in our business and the supply-chain
- Updated our "Supply-Chain Code of Conduct"
- Assessed our performance with respect to the Government's risk identification and management Modern Slavery Assessment Tool (MSAT) (our score improved vs. 2021).

In 2023, some of the actions we propose to take are:

- Develop an action plan based on the recommendations from the review conducted by Stronger Together in 2022 (please see above) and the MSAT
- Continue to review our internal manuals and procedures to ensure that they clearly set-out our requirements for both our people and the supply-chain
- Review our response plan which sets out the steps to be taken following a suspected instance of modern slavery.

Training

We have developed an e-learning module, which is designed to raise awareness of the risk of modern slavery and human trafficking in our supply-chain and our business.

As part of our sponsorship with Stronger Together, our people and supply-chain partners have access to free workshops which address modern slavery issues. In addition, we worked with Stronger Together, the CIOB and a large public sector customer to produce a video on forced labour, which aims to raise awareness of modern slavery in the UK has been made publicly accessible for use within the industry.


In 2022, we:

- Completed a "training needs" analysis to identify higher-risk trades that will be required to undertake training on modern slavery
- Required our higher-risk supply chain partners to attend the Stronger Together's Tackling Modern Slavery workshop
- Reviewed, refreshed, and updated our modern slavery e-learning module.

In 2023, some of the actions we propose to undertake are:

- Continue to roll-out training on our projects
- Following the audits of our supply-chain in 2022 (please see above), continue to drive the requirement that identified, higher-risk suppliers undertake training, including at senior management level
- Review and, where appropriate, update our reporting on the monitoring of the training performance of our people and the supply-chain.

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 ended 31 December 2022 in respect of the companies listed below.

A handwritten signature in black ink that reads "Rick Willmott". The signature is written in a cursive, slightly slanted style.

RICK WILLMOTT
Group Chief Executive

Date: March 2023

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