



Willmott Dixon
Modern Slavery Act 2015 Statement
June 2024

Introduction

Willmott Dixon is 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 Business and Structure

Willmott Dixon is a privately-owned group founded in 1852, with a turnover of £1.177 billion in 2023. We are a family run business, with executive chairman Rick Willmott being the fifth generation of the family to lead our business.

Our businesses are UK based, with our Head Office in Letchworth Garden City, Hertfordshire. Willmott Dixon principally comprises Willmott Dixon Construction and Willmott Dixon Interiors, together with supporting group functions. Please find more information in our 2023 Annual Report and Accounts.

Willmott Dixon's ultimate parent company is Hardwicke Investments Limited ('Hardwicke'). This statement is made in respect of the members of the Hardwicke group of companies listed on page 6 below.

Our purpose is to deliver brilliant buildings, transform lives, strengthen communities, and enhance the environment so our world is fit for future generations. We are dedicated to leaving a positive legacy in our communities and environment. In 2023, we were awarded a King's Awards in the category of Promoting Opportunity – one of nine UK companies to achieve this accolade. Our aim is to create value for customers, stakeholders, and communities by working in a sustainable and responsible way to shape the built environment and make a positive impact to society's wellbeing.

Our workforce is made up of around 2,000 direct employees and we collaborate with supply chain partner employees and temporary workers daily. As an accredited Real Living Wage (RLW) Recognised Service Provider, Willmott Dixon is committed to ensuring all eligible employees will be paid the RLW thereby receiving a wage that is above the government minimum.

We have created a Modern Slavery Leadership Group that is responsible for the implementation of Willmott Dixon's modern slavery policies and procedures and includes Board members (to ensure that there is Board leadership of this issue).

The Leadership Group's scope includes, but is not limited to:

- Assessing modern slavery risks;
- Development and ongoing assessment of our KPIs;
- Ensuring our people and supply chain are educated to spot the signs of modern slavery;
- Supporting the business with response and remediation.

Our Policies

We have several policies which are designed to manage the risks relating to modern slavery and human trafficking in our business (see below). These policies apply the UN Guiding Principles on Business and Human Rights by confirming our approach to managing the risk of modern slavery and demonstrating our commitment to protecting the human rights of those working within our business and our supply chain.

These policies are built into our ways of working, to help us uphold the rights of those who work for and with us, be it directly or within our supply chain. We are committed to acting ethically and with integrity and to working together with our supply chain to address, and where appropriate tackle, modern slavery and human trafficking. These policies and procedures include:

- Code of Ethics, sets out the standards of behaviour and business conduct expected of those who do business on our behalf, noting our commitment to operating at the highest ethical standards.
- Anti-Bribery and Corruption Policy, alongside the above Code of Ethics, sets out Willmott Dixon's responsibilities, and those of our people, in observing and upholding our position on bribery and corruption.
- Anti-Slavery and Human Trafficking Policy, guides our commitment and approach to addressing modern slavery and human trafficking in our business and supply chain, and requires the systems and processes that are designed to mitigate the risk within our operations to be followed.
- Human Rights Policy, sets out how Willmott Dixon seeks to align strategies and operational activities while respecting human rights.
- Supplier Code of Conduct, outlines specific standards and responsibilities that our supply chain must adhere to, including Right to Work and Modern Slavery code of conduct.
- Sustainable Procurement Policy, requires that goods and services be sourced fairly throughout our supply chain, utilising sustainable procurement methods.
- Whistleblowing Policy, which provides a mechanism for reporting breaches of these policies and is available to our people and our supply chain.

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 take a proactive approach to managing the risk of modern slavery and labour exploitation happening in our supply chain. This includes conducting regular risk assessments (that consider factors including the location in which materials are sourced and procured), undertaking due diligence, regularly engaging with our supply chain partners, and collaborating with industry partners.

We have a detailed on-boarding process that includes a pre-qualification questionnaire to assess suppliers' processes and policies and visiting supplier premises, enabling the delivery of key messages, including modern slavery indicators and the mechanism for raising a concern.

Our group-wide risk assessment, in-line with ISO 20400, identified those parts of our supply chain which appear to be most vulnerable to modern slavery. This assessment has assisted us to develop our processes and controls which are designed to manage the risk, which are kept under review.

In 2023, we:

- Supported our supply chain to review and implement the outcomes from modern slavery audits carried out in 2022 and 2023
- Together with the "Ethical Labour Group" (see below) established by a major public sector framework provider (see also "Industry Collaboration"), conducted eight unannounced ethical site survey audits on our project sites
- Using the findings from the ethical site surveys, conducted further three ethical employment audits of higher-risk members of our supply chain
- Updated our "Right to Work: Employer's Guidance" briefing note to support the supply chain on right-to-work checks during recruitment.

In 2024, some of the actions we propose to take are:

- Conduct further modern slavery audits within our supply chain
- Support our supply chain partners to review and implement the outcomes from the modern slavery audits
- Continue to drive the requirement that higher-risk suppliers undertake training, at senior management level, on modern slavery issues
- Encourage higher-risk suppliers to report to us any concerns relating to modern slavery in their own supply chain
- Review and monitor our data and KPIs
- Continue to assess the potential for forced labour within certain elements of our supply chain.

Industry Collaboration

We have worked in collaboration for over seven years with other organisations and industry partners to manage the risks of modern slavery and human trafficking in our supply chain and within our industry.

We are 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 an Ethical Labour Group of a major public sector framework which set minimum compliance standards for contractors and their supply chains and a founding partner of the Supply Chain School, being a member of its Construction Leadership Group and Modern Slavery Working Group. We have signed the School's "People Charter", which aims to create a single set of standards for the construction sector. In 2023, we:

- Reviewed, identified and used the common findings from the modern slavery audits undertaken in connection with our business to inform and support the wider construction sector
- Contributed to the Ethical Labour group of a major public sector framework
- Joined the Supply Chain School's modern slavery working group collaborating to address modern slavery and labour exploitation risks across the built environment
- Contributed to Action Sustainability's freely available toolkit: Addressing Modern Slavery and Labour Exploitation in Solar PV Supply Chains Procurement Guidance
- Published our updated "Right to Work: Employer's Guidance" briefing note (see also "Our Supply chain") on the Supply Chain School to support wider supply chains.

In 2024, some of the actions we propose to take are:

- Review and identify common findings from the modern slavery audits carried out in 2023 and 2024 (see "Our Supply chain"), in collaboration with other main contractors from the Ethical Labour group of a major public sector framework
- Deliver external training sessions in collaboration with the Supply Chain School that highlight best practices for identifying and mitigating key risk categories in the construction 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

We enter into written agreements with members of our supply chain that require them to comply with the Modern Slavery Act 2015 and our Modern Slavery Policy (including rights to audit).

To support our supply chain with compliance, we have:

- A dedicated Supply chain Team that regularly engage with our supply chain and play an important role in supporting modern slavery compliance
- Trained senior managers, who act as dedicated regional points of escalation, on modern slavery concerns that may arise from our people and supply chain (see also "Training")
- Provided guidance about modern slavery and "right-to-work" requirements, for example updated guidance checklist and training videos to outline their responsibilities under the relevant legislation.

To enable us to monitor compliance, we use an external auditor to conduct both announced and unannounced ethical audits on our projects and supply chain to evaluate the risk of labour exploitation and identify the higher-risk areas of our supply chain. We have implemented a programme of spot checks on our sites following the audits, and we work closely with our supply chain on any feedback.

In 2023, we:

- Assessed our performance with respect to the Government's risk identification and management Modern Slavery Assessment Tool (MSAT) achieving 89% (our score improved vs. 2022)
- Developed and actioned a plan based on the recommendations from the MSAT and a previous review of our systems, policies and procedures (which was conducted by Stronger Together)
- Reviewed and strengthened our response plan and worked with Unseen, the modern slavery charity, to train relevant operational roles on the steps to be taken following a suspected instance of modern slavery.

In 2024, some of the actions we propose to take are:

- Further develop the action plan based on the recommendations from the MSAT
- Continue to train relevant operational roles on the steps to be taken following a suspected instance of modern slavery
- Drive the requirement that higher-risk suppliers demonstrate steps taken to manage the risk of modern slavery within their business
- Collect and report data to map our supply chain to give better insight into their approach to tackling modern slavery
- 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.

Training

We have developed e-learning modules for both our people and supply chain which are designed to raise awareness of the risk of modern slavery and human trafficking in our supply chain and our business.

In addition, we have created other learning materials that are now publicly available which aim to raise awareness of modern slavery for the wider industry.

In 2023, we:

- Reviewed and updated our reporting on the monitoring of the training performance of our people and the supply chain
- Developed our own modern slavery "Learning Pathway" through the Supply Chain School and required our higher-risk supply chain partners to complete it
- Worked with Unseen to deliver a modern slavery response training workshop to senior managers within the business who act as dedicated regional points of escalation for modern slavery concerns that may arise from our people and supply chain (see also "Due Diligence").

In 2024, some of the actions we propose to undertake are:

- Continue to roll-out modern slavery training on our projects and central support services
- Continue to drive the requirement that higher-risk suppliers undertake training, including at senior management level
- Continue to work with Unseen to deliver modern slavery response training to relevant operational roles within the business
- Review and, where appropriate, update our reporting on the monitoring of the training performance of our people and the supply chain.

This statement was approved by the Board of Directors of Hardwicke Investments Limited, 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 2023 in respect of the companies listed below.

For and on behalf of the Board of Directors of Hardwicke Investments Limited:



Graham Dundas
Chief Executive Officer

Date: 18 June 2024

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