

Anti-Slavery and Human Trafficking Policy

1. Introduction

The Watkin Jones Group (WJG) is committed to providing a workplace and culture that supports a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

2. Structure of the Organisation

WJG is a UK based Company in the construction, property development and facilities management sector. It is the parent company of the Group and employs circa 1,000 people throughout the UK, supported by some 1,500 sub-contracted workers and has business operations in the UK and Republic of Ireland.

WJG has an annual turnover of £400 million. To find out more about the nature of our business, please click [here](#).

In order to acquire sites, agree financial investment and construct/develop state of the art properties, we work with a range of suppliers including building materials suppliers, fittings and furnishings, trade services such as electrical, plumbing and site management. In addition, the Company may on occasion engage with third party employers and sub-contractors for labour support.

3. What is covered by the policy and procedure?

This policy applies to all areas of the Company and supply chains. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

4. Who is covered by the policy and procedure?

This Policy applies to all of our people employed by Watkin Jones Group on either permanent or fixed-term contracts of employment – including to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

The Company is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners and make sure they are aware of our policies. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

5. Responsibilities

The Board of Directors, led by the CEO, has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those employed by or working with WJG comply with it.

The compliance officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.





All colleagues are invited to feed into the policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance officer via Compliance@WatkinJones.com

6. Risk and compliance

WJG regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by undertaking a detailed supply chain evaluation which adopts a thorough and intensive pre-selection process. Our suppliers and subcontractors are made aware of the requirements to achieve Supply Chain Partner status. A detailed database of approved suppliers and subcontractors is maintained, and new firms can only be added once quality, safety, environmental and financial checks have been carried out.

We do not consider that we operate in high risk sectors or locations because all our sites are based in the UK or Republic of Ireland. All employees/sub-contractors or third party labour is appointed via a UK employer or agency and as such our workforce have provided evidence of their right to work in the UK. All our materials, fixtures and fittings are provided by supply chain partners who have fulfilled the requirements of the detailed evaluation and pre-selection process.

Where we have identified a potential risk, we would conduct regular audits / site visits and where issues arise, we may consider ceasing to use the specific supplier.

We ensure our suppliers are aware of our Anti-slavery and Human Trafficking policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. If we find evidence of a failure to comply with our policies, we will immediately seek to terminate our relationship with the relevant supplier.

In recent times, as a result of the COVID-19 pandemic, WJG was aware that some workers could be more vulnerable to modern slavery, specifically in the following areas:

- The health and safety of workers – WJG followed the appropriate government guidelines as a result of the COVID-19 pandemic and ensured these guidelines were followed on WJG sites by all employees and suppliers.
- Supporting suppliers – WJG continued to engage with suppliers which has included paying for products and services already agreed.
- Grievance procedure – WJG’s grievance procedure was updated to allow meetings to take place remotely using video-link as opposed to face to face. This is taking into account the relevant government guidelines of social distancing and reduced travel.
- Recruitment – WJG continued to ensure that checks were conducted during the recruitment process to ensure that vulnerable workers are not being exploited by third parties.

7. Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- Step 1 – Detailed supply chain evaluation
- Step 2 – Detailed and accurate procurement process
- Step 3 – Selection of appropriate subcontractors and suppliers
- Step 4 – On site quality control
- Step 5 – Development review on project completion
- Step 6 – Quality through continuous improvement

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers



8. What to do if you have concerns

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All colleagues are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must speak to either your manager or the compliance officer as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

All colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible. The whistleblowing contact details are:

Tel: 0800 086 9942

Web: www.watkinjones.ethicspoint.com

If you are unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the compliance officer.

9. Disclosure / Whistleblowing

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance officer immediately or raise this under the Whistleblowing procedure. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance procedure and contact HR.

10. Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

11. Further actions

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we are satisfied that there are no current risks and as such no actions are required.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Watkin Jones Group's slavery and human trafficking statement for the financial year commencing 2022 and ending 2023.

This statement was approved by the Board on 21 March 2023.

Signature:



Richard Simpson – CEO Watkin Jones plc

