

SLAVERY AND HUMAN TRAFFICKING STATEMENT

The Wates Group is proud of the ethical standards that it has embedded into its business over many years and believes that these standards are consistent with the underlying principles of the Modern Slavery Act 2015. Slavery and the trafficking of people have no place in the modern world, and Wates considers that the new legislation will become an important part of doing business both in the UK and overseas. We are therefore committed to enhancing our practices to combat slavery and human trafficking.

THE WATES GROUP STRUCTURE

The Wates Group is an independent and family owned construction, house building, maintenance, building services and facility management services company. It is the ultimate parent company of a number of Group companies that in total employs approximately 3,000 people. Our work takes place predominantly in the UK but we also have an office in Abu Dhabi. The Wates Group has an annual turnover of approximately £1.2 billion, and the following Wates Group companies have a turnover in excess of £36 million:

- Wates Construction Limited
- Wates Developments Limited
- Wates Group Services Limited
- Wates Living Space (Maintenance) Limited
- SES (Engineering Services) Limited.

This statement is made on behalf of Wates Group and the individual Group companies referred to above in accordance with the requirements of the Modern Slavery Act 2015 and its contents take account of the activities and supply chains of them all.

OUR POLICY ON ANTI-SLAVERY AND HUMAN TRAFFICKING

The Wates Group Anti-Slavery and Human Trafficking Policy may be found [here](#).

We are committed to ensuring, so far as we are able, that there is no modern slavery or human trafficking in our supply chains or in any part of our business and we take a zero-tolerance approach to slavery and human trafficking. Our supply chains include sub-contractors, suppliers, labour agencies and professional services providers. Our Anti-Slavery and Human Trafficking Policy reflects a long-standing commitment to acting ethically and with integrity in all of our business relationships, supported by the development and implementation of effective systems and controls.

OUR ANTI-SLAVERY AND HUMAN TRAFFICKING ASSURANCE PROCESS

As part of an initiative to identify and mitigate risk in respect of slavery and human trafficking, we have:

- Undertaken a slavery and human trafficking risk assessment to enable us to apply a risk-based and proportionate approach to dealing with slavery and human trafficking issues;
- Developed and agreed our Anti-Slavery and Human Trafficking Policy based upon our risk assessment;
- Reviewed the contracts that we have with our supply chain, and amended these to require compliance with the Modern Slavery Act 2015 where appropriate. For those of our supply chain with whom we have entered into a Wates Group trading agreement, we have enhanced our audit process to include slavery and human trafficking issues;
- Mandated, where appropriate, that our supply chain be registered with the Constructionline validation system, which requires our supply chain to confirm their compliance with the Modern Slavery Act;
- Widened the scope of the Wates Group whistle-blowing procedures to include the reporting of modern slavery and human trafficking issues, so that any individual may confidentially raise a potential issue; and
- Begun implementing targeted training for those involved in procurement and/or with responsibility for supply chain management.

Finally, we are currently developing a third party auditing process for targeted, high risk projects in circumstances where we are procuring directly.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and in our business, we will provide training to our staff that is proportionate to the level of risk.

DEVELOPING FOR THE FUTURE

As our approach to slavery and human trafficking develops, we will also devise a process of monitoring and measuring our performance so that we can assess how well we are doing and whether additional procedures may be necessary. We are committed to reporting publicly about our performance each year.

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 Wates Group and its Group companies for the financial year ending 31 December 2016.

Andrew Davies
Chief Executive, Wates Group Limited

For and on behalf of Wates Group Limited and its Group companies
Date: 29 April 2016