

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY



Wates Group is a family owned Construction, House Building, Maintenance, Building Services and Facility Management Services company. As a leader in our chosen markets, our objective is to deliver excellent services for our customers, resulting in safe, fair and professional contracting services at all times.

We recognise that the execution of our services involves labour being procured throughout our business and supply chains and understand that this entails the risk that modern slavery may take place. 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 in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in either our own business, or in any of the businesses of our supply chains.

Our approach to ensuring that slavery and human trafficking do not take place within our organisation is one of risk management driven by our core values:

INTEGRITY

We are committed to ensuring that there is transparency in our business and in our approach to tackling modern slavery that is consistent with our disclosure obligations under the Modern Slavery Act 2015.

INTELLIGENCE

We will take an intelligent approach to ensuring that our business and supply chains have effective systems and controls in place to ensure that slavery does not take place.

TEAMWORK

Our employees and supply chain will work together in alignment with our internal processes to ensure compliance with the Modern Slavery Act 2015.

PERFORMANCE

We are committed to implementing systems and processes to ensure that there is zero-tolerance towards any acts of modern slavery within our business and throughout our supply chains.

RESPECT FOR PEOPLE AND COMMUNITIES

We believe that modern slavery violates fundamental human rights and we are committed to play our part in ensuring that this does not take place within our community.

In adhering to this policy, in particular we will:-

- Include, as part of our contracting processes within our supply chain, obligations to ensure compliance with the requirements of the Modern Slavery Act 2015.
- Encourage openness and provide support to anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that 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 the businesses of any of our supply chains.
- Communicate our zero-tolerance approach to modern slavery with our supply chain and business partners at the outset of our business relationship with them.

Our employees are collectively and personally responsible for the communication, understanding and practical application of this policy. This policy will be made available to all new employees at recruitment stage and to our supply chain and to any other interested parties upon request. Revisions will be communicated to those affected by the changes.

Our employees have a personal responsibility to report any actual or suspected instances of modern slavery throughout the business or supply chain to the Wates Group's Commercial Legal Advisor. Breaches of this policy will be dealt with under Wates Group's disciplinary procedures, and could lead to dismissal in appropriate circumstances.

The Executive Committee has overall responsibility for ensuring this policy is complied with and will review it at least once per year, and at such other times as may be required, to ensure it remains relevant and appropriate to the aims and objectives of our business.

A handwritten signature in black ink that reads "D. O. Allen".

For and on behalf of the Executive Committee

DAVID ALLEN
Chief Executive
May 2018