

# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY



**Established in 1897, we are the UK's leading family-owned development, building and property maintenance company. We employ over 4,000 people and work with a wide range of public and private sector customers and partners. Now in our fourth generation of family ownership, we're committed to the long-term sustainability of the built environment and to making our industry more inclusive and representative of the communities we work in. We are driven by our shared purpose of working together to inspire better ways of creating the places, communities and businesses of tomorrow.**

Modern Slavery is a serious crime, which sees vulnerable people exploited for financial gain. We understand that the construction industry faces particular challenges to ensure the ethical management of labour and we are dedicated to playing our part to address the serious impact of modern slavery in our sector.

We implement and enforce effective systems and controls to support our zero-tolerance approach to modern slavery, and this also enables us to:

- Achieve our stated targets and goals
- Ensure we remain the service provider of choice

Our approach to Modern Slavery prevention is supported by the goals and behaviours set out in our Guiding Framework.

We are committed to transparency in our business and in our supply chains and our employees and our supply chain will work together to ensure compliance with the Modern Slavery Act 2015.

In adhering to this policy, we will:

- Understand where we are at risk of Modern Slavery in our business and our supply chains
- Assess and evaluate how to mitigate those risks
- Implement, maintain and continually improve our policies, procedures, rules and guidance to support Modern Slavery prevention
- Include obligations to comply with all requirements of the Modern Slavery Act 2015 in our supply chain contracts

- Encourage openness and provide support to anyone who raises concerns in good faith, even if these concerns turn out to be mistaken
- Adopt a zero-tolerance approach to retaliation against anyone raising a concern in good faith
- Communicate and reinforce our zero-tolerance approach to Modern Slavery with our employees, supply chain and business partners throughout our relationship with them
- Comply with our obligations to produce a Modern Slavery Statement under the Modern Slavery Act 2015

Our employees have a personal responsibility to report any actual or suspected instances of modern slavery throughout the business or supply chain to Wates Ethics by email ([SpeakUp@wates.co.uk](mailto:SpeakUp@wates.co.uk)), Safecall phoneline (0800 9151571) or web ([www.Safecall.co.uk/report](http://www.Safecall.co.uk/report)).

Breaches of this policy will be dealt with under Wates Group's disciplinary procedures and could lead to dismissal in appropriate circumstances.

This policy applies to all our employees and those working with us or on our behalf. Successful implementation requires everyone to cooperate, commit and assist us to ensure that anti-slavery and human trafficking issues and risks are given adequate consideration.

**The Executive Committee has overall responsibility for ensuring this policy is complied with. It will be reviewed at least once a 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.**

**For and on behalf of the Executive Committee**

**EOGHAN O'LIONAIRD**  
Chief Executive  
May 2023

**CREATING  
TOMORROW  
TOGETHER.**