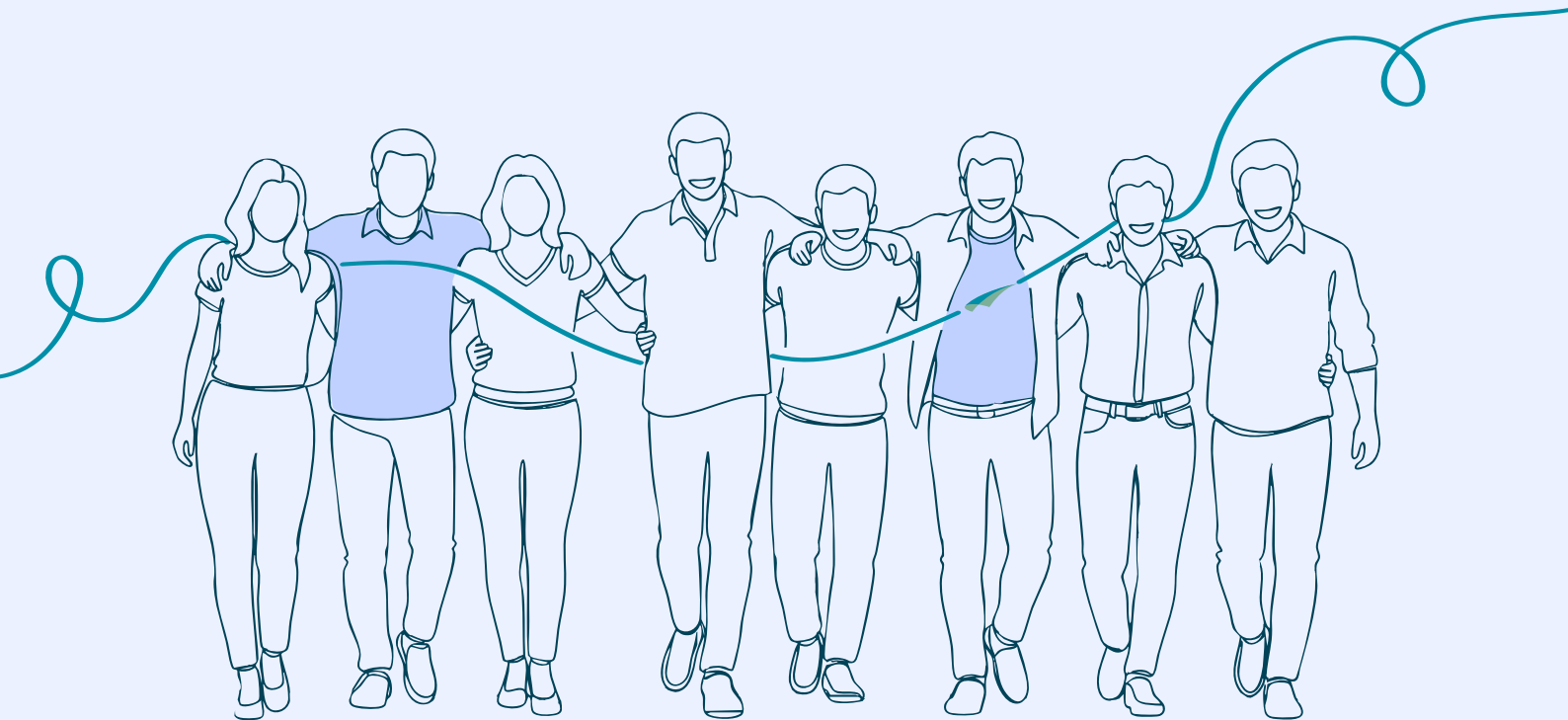


# Reimagining a more ethical future where people can thrive

---

**Our modern slavery statement**  
(Year ending 31 Dec 2025)



Reimagining places  
for people to thrive

**Wates**

# A message from our CEO

**Modern slavery remains a serious crime that causes profound harm to vulnerable people, and the construction industry continues to face real and evolving risks.**

At Wates, we recognise these challenges and remain firmly committed to preventing all forms of exploitation within our business and supply chain.

Over the past year, as part of our ongoing commitment to our purpose – reimagining places for people to thrive – we have worked to ensure that the people who help to build these places are treated with dignity, fairness and respect.

Taking a data-driven approach, we have used the risks identified in our audits to shape our priorities and actions. We have also continued to work closely with expert organisations, including Unseen.

It is our belief that responsible business and strong performance go hand in hand. We will continue to challenge ourselves, raise expectations across our supply chain and take decisive action where standards fall short.

Together with our colleagues, partners and the wider industry, we remain committed to tackling this crime and upholding the highest standards of behaviour in everything we do.



**Eoghan O'Lionaird**  
Chief Executive



“ It is our belief that responsible business and strong performance go hand in hand. ”

## Contents

- 1 A message from our CEO
- 2 Our structure, business and supply chain
- 3 Modern slavery governance
- 4 Our policies
- 5 Risk assessment, prevention and mitigation
  - 5.1 Understanding the risks
  - 5.2 Temporary labour
  - 5.3 Materials procurement
  - 5.4 Recruitment
  - 5.5 Mergers and acquisitions
  - 5.6 Victim support / incident management
- 6 Due diligence
  - 6.1 Supply chain
  - 6.2 Recruitment
- 7 Training and awareness
- 8 Action plan for 2026
- 9 Sign-off

# Our structure, business and supply chain

The Wates Group was established in 1897 and is one of the leading privately-owned construction, development, building and property services companies in the UK.

## Our structure and business

Our businesses are UK based with our head office in Leatherhead.

### Construction

Our construction division delivers innovative and sustainable projects across the UK, serving both public and private sector customers. There are three business units within the Construction division:

- Construction, which delivers large public and private sector programmes and projects.
- Smartspace, our fit out and refurbishment business, which services public and private sector frameworks.
- Our recently created Fit Out business which is focussed on the London commercial market.

### Land & Development

The Wates Land & Development division comprises Wates Developments, Wates Commercial & Logistics, Wates Wildspace and Wates Assets (formally Needspace).

### Residential

Our residential business is among the leading contractor developers in London, the South of England, and Wales. We work in partnership, investing in local authority partners and housing associations to build high quality, mixed tenure housing schemes. We are driven by the belief that everyone deserves a great place to live.

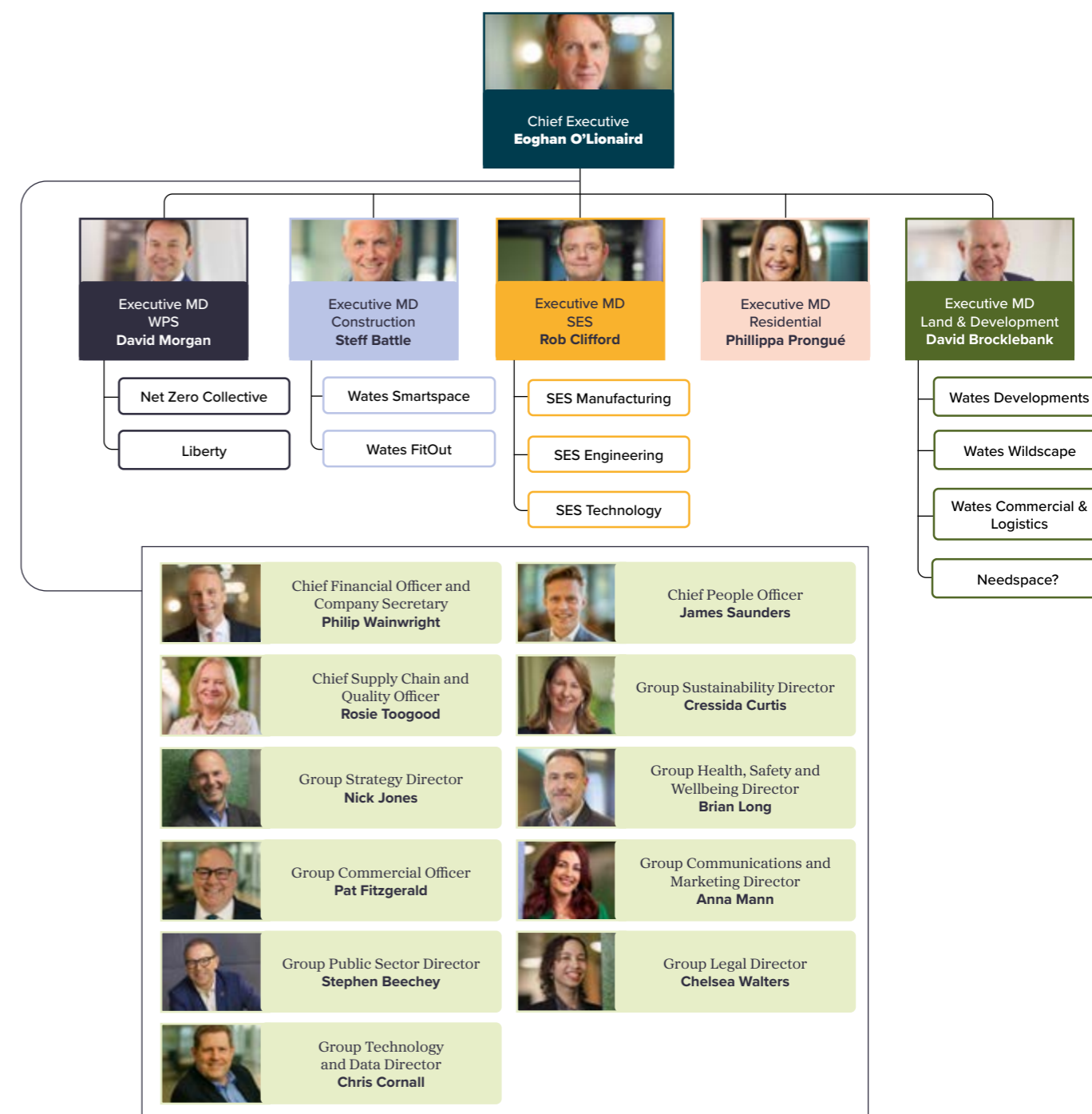
### SES

SES is an award-winning, designed mechanical and electrical, offsite manufacturing and specialist services provider. Our remit is to promote the adoption of modern methods of construction, wherever possible, and explore innovative technologies to help deliver better and more sustainable projects for our customers.

### WPS

Our property services business is a market leader in planned and responsive housing repairs, and zero carbon retrofit services, for public sector landlords and housing associations, providing a broad range of services including fire safety works.

You can find out more information on the services that we offer to our clients and partners in our latest annual reports and accounts: <https://annualreview.wates.co.uk>.



## Our supply chain

### Our Supply Chain Overview

Wates operates a large, diverse and multi-tiered supply chain spanning construction, residential, fit-out, engineering services and Group-wide support activities. Our supply chain consists of several thousand subcontractors, labour agencies, manufacturers, product suppliers and professional service partners. These suppliers operate across the UK, with parts of the materials we procure manufactured in higher-risk global regions as defined by the Global Slavery Index<sup>1</sup>. Because of this breadth and complexity, our supply chain includes multiple tiers that can change over the lifecycle of a project, particularly where temporary or specialist subcontract labour is required.

To strengthen visibility, we continue to expand our programme of supply chain mapping. We are also utilising tools prioritising high-risk product categories as defined by the US Department's Bureau of International Affairs' "Lists of Goods Produced by Child Labor or Forced Labor"<sup>2</sup>, and resources from the Supply Chain Sustainability School<sup>3</sup> to identify high-risk geographies and product categories.

We understand that there are inherent risks within construction supply chains.

### Modern slavery risks in materials supply chains

Construction materials are recognised industry-wide as a high-risk area for modern slavery. Key risks include:

- Forced labour in raw material extraction and manufacturing, particularly in countries identified as high-risk by international indices.

- Unethical recruitment practices, including recruitment fee charging, passport retention, debt bondage or withholding of wages within overseas supplier operations.
- Limited visibility of sub-suppliers and lower-tier manufacturers involved in complex product supply chains.
- Supplier pressure and purchasing practices, such as short lead times, rapid design changes or price pressures that can unintentionally increase risks of labour exploitation within lower tiers of production.
- Unregulated labour intermediaries within international manufacturing and processing hubs.

### Modern slavery risks in temporary and subcontracted labour

Temporary labour forms a core part of the UK construction industry, including on Wates sites. Wates utilises around 900 – 1000 temporary workers at any one time through labour agencies, and many more temporary workers are engaged at lower tiers of the supply chain.

The industry's reliance on short-term, low-skilled, migrant and subcontracted workers creates specific vulnerabilities, including:

- Use of labour agencies and intermediaries where oversight is reduced and accountability is dispersed across multiple subcontract tiers.
- Daily or weekly fluctuations in site workforce, making it harder to monitor working conditions, rights awareness and payment practices.

- Potential underpayment, illegal deductions, misleading recruitment information or exploitative working hours for those working through subcontractors or third-party payroll providers.
- Language barriers, limiting understanding of rights and routes to report concerns.
- Greater risk of coercion, particularly for migrant workers who may be dependent on accommodation, transport or employment tied to a single provider.

### Locations of risk within our supply chain

The majority of our suppliers operate within the UK and we recognise that this brings an inherent risk in relation to labour. In addition, many key construction materials originate from international supply chains. Specific examples include:

- Solar panels and polysilicon components, where a proportion of global production is linked to potential forced labour risks in the Xinjiang region of China.
- Bricks, gravel, PPE and other high-volume construction materials, which the UK Government and global indices such as the US Department's Bureau of International Affairs' "Lists of Goods Produced by Child Labor or Forced Labor" have identified as high-risk due to labour exploitation concerns in certain manufacturing regions.

To address risks in both materials and labour supply chains, we have implemented a comprehensive programme that includes:

- Mandatory contractual requirements through our Anti-Slavery and Human Trafficking Standard, binding all suppliers to minimum labour standards which are



aligned to the Ethical Trading Initiative base code<sup>4</sup> and requiring equivalent obligations in their own supply chains.

- Supply chain mapping to identify the original manufacturing locations of materials, prioritising high-risk product categories as defined by the US Department's Bureau of International Affairs' "Lists of Goods Produced by Child Labor or Forced Labor" for deeper due diligence, for example solar panels (see 5.3 Materials Procurement).
- Ethical audits on sites to assess real-time working conditions, verify that employers have conducted right to work checks, that workers have access to their documentation, review pay practices and identify warning signs of exploitation.
- Worker engagement, including toolbox talks, posters in multiple languages, updated induction materials, and awareness training on rights, grievances and whistleblowing.
- Collaboration with partners, including Unseen, labour providers, industry forums and client working groups, helping us test, challenge and strengthen our approach.
- Escalation and remedy mechanisms, ensuring that any suspected cases are addressed sensitively, confidentially and in accordance with our Modern Slavery Response and Remedy Framework.

1 | <https://www.walkfree.org/global-slavery-index-2> | <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>  
3 | <https://www.supplychainschool.co.uk/topics/sustainability/modern-slavery/>

4 | <https://www.ethicaltrade.org/eti-base-code>

# Modern slavery governance

**Our modern slavery programme is sponsored jointly by our Group Sustainability Director and Group Legal Director who are members of the Wates Executive Committee.**

The modern slavery programme is underpinned by our modern slavery framework. The framework ensures our compliance with key legal and best practice guidance, covering:

- Top level commitment;
- Risk assessment;
- Policies, procedures and governance;
- Due diligence;
- Training and communication; and
- Monitoring and review.

Responsibility for management of the modern slavery framework sits with our Ethics and Compliance team. The framework is reviewed on an annual basis.

Each year we also complete the Modern Slavery Assessment Tool (MSAT) which also helps us to identify key areas for improvement.

The framework and MSAT provide a basis for our modern slavery action plan. The action plan details our key areas of improvement and development for the year ahead.

The Modern Slavery Steering Committee is chaired by the Head of Ethics and Compliance and includes representatives from Legal, Procurement, Sustainability and members of our Divisional Boards.



The scope of the Steering Committee includes:

- Monitoring areas for improvement and development and providing feedback;
- Identifying risks and sharing best practice;
- Managing the audit programme;
- Overseeing remediation actions;
- Overseeing delivery of training and awareness materials;
- Engaging with the supply chain and supporting supply chain mapping; and
- Monitoring our performance against KPI's.

In 2025, we updated our approach to strengthen our Modern Slavery Steering Committee including a review of membership and more detailed governance and accountabilities for members.

The UN Sustainable Development Goals (SDGs) were adopted by world leaders in 2015 to create a blueprint for a more sustainable future for all. SDG 8.7 specifically calls for immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking, and secure the prohibition and elimination of the worst forms of child labour. At Wates, our sustainability policies are aligned to the SDGs, which we also use as a framework to guide our sustainability strategy.

# Our 2025 achievements in brief

**2024 KPI**

To complete three worker wellbeing site visits (supported by Unseen) by the end of 2025 with the outputs reviewed by the Modern Slavery Working Group and reported to the Executive Risk Committee to implement remediation actions and improve standards across the Group.

**2025 update**

We completed four worker wellbeing site visits supported by Unseen. Findings were reviewed by the Modern Slavery Steering Committee and a report on modern slavery was provided to the Executive Committee. As a result of the worker wellbeing visits remediation actions were implemented to raise standards, improve worker protections and inform future audit activity.

**2024 KPI**

To implement a modern slavery remediation and escalation protocol providing clear escalation routes where concerns are identified and setting out action plan steps to support remediation by Q3 2025.

**2025 update**

In 2025, we implemented a Group-wide remediation and escalation framework, setting out clear roles, reporting routes and safeguarding steps to ensure concerns are addressed quickly and consistently. This formalises and strengthens the processes we have been evolving over recent years, providing a structured approach to supporting affected individuals and driving corrective action.

**2024 KPI**

To ensure 95% compliance with our modern slavery e-learning.

**2025 update**

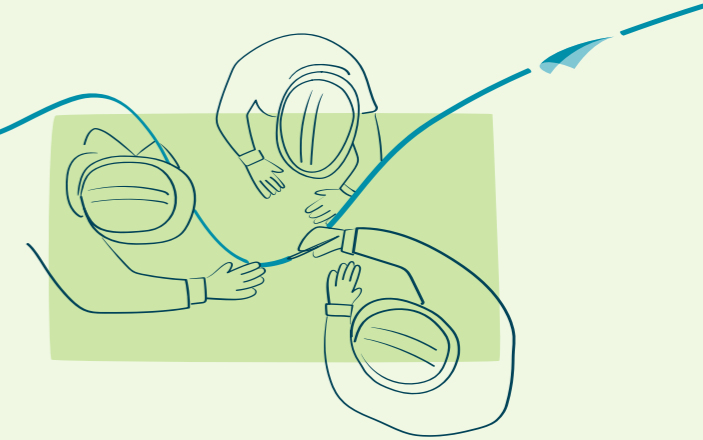
We achieved 95% completion rates in our Group Services and in 3 of our 5 Divisions. We increased completion rates across the Group and have continued to drive accountability for timely training. We will continue to build on our completion rates throughout 2026.

**2024 KPI**

To complete a modern slavery gap analysis (supported by Unseen) looking at areas for development and improvement in our programme by Q2 2025.

**2025 update**

Working with Unseen, we completed a comprehensive gap analysis to benchmark the maturity of our programme. The review highlighted strengths in governance and training, while identifying priority areas for development, which now inform the next phase of our modern slavery improvement plan.



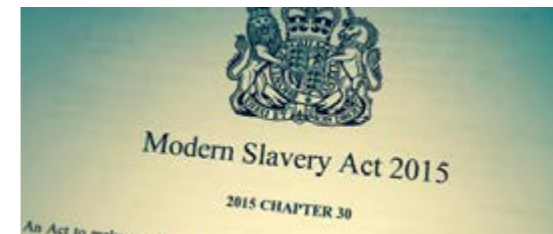
**Our other achievements**



In 2025 we continued to build on our partnership with Unseen. We are proud to work with a charity that helps to protect workers against exploitation as well as supporting survivors. Working with Unseen has allowed us to ensure our policies, procedures and training are keeping pace with evolving risks, and to strengthen our ability to identify, respond to and prevent exploitation.



We have participated in the Supply Chain Sustainability School – Built Environment Against Slavery group and have become a member of the Unseen Construction Hub.



We have made improvements to our Toolbox Talks programme, introducing new Toolbox Talks explaining employment rights as well as enhancing our existing Toolbox Talks on modern slavery awareness.



We supported Anti-Slavery Day through a communication and awareness campaign for our employees and supported by a dedicated modern slavery resources page on our intranet.

# Our policies

## We have robust internal policies in relation to modern slavery that we are committed to following

We comply with a wide-ranging suite of policies that are signed off by our Chief Executive and are reviewed on an annual basis. These policies are available to all staff by way of our internal Intranet and are published on our website in our Corporate Governance library:

<https://www.wates.co.uk/about-wates/corporate-governance/>

Our key modern slavery policies include our:

- Code of Conduct;
- Anti-Slavery and Human Trafficking Standard;
- Anti-Slavery and Human Trafficking Policy;
- People Policy;
- Safeguarding Policy;
- Whistleblowing Policy;
- Equality, Diversity and Inclusion Policy;
- Grievance Policy; and
- Sustainable Procurement Policy.

Compliance with our Code of Conduct, Anti-Slavery and Human Trafficking Policy and Anti-Slavery and Human Trafficking Standard is required from our supply chain members and is included within our contracts.

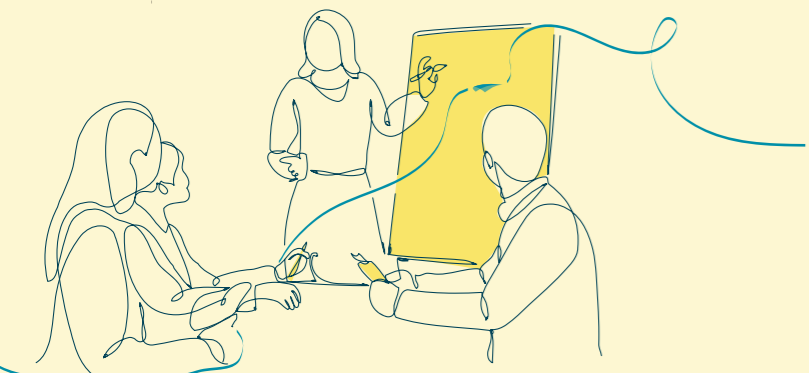
### Code of Conduct

Our Code of Conduct reflects our commitment to eliminating human trafficking, slavery, servitude and forced or compulsory labour within our business, defining the standards that we expect from our employees, temporary staff and supply chain partners.

Our Code of Conduct is approved by our Group Board and CEO and is reviewed on an annual basis. In 2024 a new specific Code of Conduct e-learning module was launched for all employees which must be completed on joining the business and every two years thereafter.

The Code of Conduct is supported by an online Toolkit which contains frequently asked questions and is available to our employees. Our Code is published both internally and externally and can be found on our website.

Oversight of the Code of Conduct is managed by the Ethics and Compliance team and is supported by our whistleblowing programme. The Code was last updated in November 2025.



### Anti-Slavery and Human Trafficking Policy

Our Anti-Slavery and Human Trafficking Policy sets out our zero-tolerance approach to modern slavery in our business and in our supply chains, and reinforces our long-standing commitment to:

- Understand, evaluate and mitigate the risks to our business and in our supply chains;
- 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 in our supply chain contracts;
- Encourage openness and provide support to anyone who raises a concern relating to modern slavery, even if they turn out to be mistaken;
- Adopt a zero tolerance approach to retaliation against anyone raising a concern in good faith; and
- Communicate and reinforce our zero-tolerance approach to modern slavery with our employees, supply chain and business partners.

Our policy was reviewed in 2025.



### Anti-Slavery and Human Trafficking Standard

In conjunction with our Code of Conduct and Anti-Slavery and Human Trafficking Policy, our Anti-Slavery and Human Trafficking Standard sets out the minimum labour standards that we require from all members of our supply chain, including obligations to:

- Provide evidence (when requested) that our supply chain have met the requirements of the standard;
- Include obligations within their own supply chain agreements that are (as a minimum) equivalent to the requirements of the standard;
- Ensure any labour agencies used operate legally and do not place workers at risk of modern slavery; and
- Ensure that those in the supply chain adhere to all local and national laws relating to modern slavery and the treatment of workers.

The Standard covers our expectations in relation to:

- Freedom of movement and to choose employment;
- Freedom of association;
- Contracts of employment;
- Protection of young people;
- Safe and hygienic working environment;
- Fees;
- Legal status;
- Pay and benefits;
- Working hours and rest;
- Grievance; and
- Discrimination and Harassment.

Our Anti-Slavery and Human Trafficking Standard was last reviewed in 2025.

The standard forms part of our contractual terms with our supply chain and our supply chain agrees to be audited on compliance.

# Our policies (cont.)

## Dealing with Modern Slavery – Guidance

Our Dealing with Modern Slavery Guidance sets out how colleagues should identify and respond to potential modern slavery risks across our operations and supply chain, including higher-risk countries, products and recruitment practices. The guidance covers:

- Spotting the signs;
- Reporting concerns;
- Protecting victims;
- Modern slavery in our products; and
- Supporting access to remedy, compensation and justice.

This guidance provides clear steps for escalating concerns and directing individuals to appropriate support.

The guidance reinforces the need to prioritise victim safety, maintain confidentiality and involve the Ethics and Compliance team where necessary. It also links to key policies and standards that underpin our Group-wide approach to preventing exploitation.

## Modern Slavery Response and Remedy Framework

In 2025 we created a new framework specifically focussed on how we identify, respond to and remediate any suspected or confirmed instance of modern slavery within our operations or supply chain.

The framework provides clear guidance for colleagues on recognising concerns, escalating issues quickly and ensuring the safety and wellbeing of affected individuals. Every case is assessed based on its specific circumstances, with support from the Ethics and Compliance team.

Access to remedy is a core principle. This may include immediate safeguarding

measures, signposting to statutory or specialist support, and putting in place corrective actions to prevent recurrence – supported by learning reviews, policy updates and strengthened grievance processes.

The framework also reinforces our reporting routes, including emergency escalation and confidential whistleblowing channels, and aligns with our Anti-Slavery and Human Trafficking Policy and Supply Chain Standard to ensure a consistent, Group-wide approach.

## Dealing with Modern Slavery – Guidance

We have a range of internal company rules, procedures, and professional standards that we are committed to following:

- On joining the business, all employees and temporary staff complete an induction programme, including training on modern slavery. Our training consists of modern slavery e-learning, induction materials and modern slavery toolbox talks. We also have in place a Compliance Bites programme, this includes “bitesize” training videos on modern slavery to support our training programme (see Training and Awareness);
- We review our suppliers in accordance with a defined process, including Constructionline accreditation, conducting due diligence and assessing IR35 status; (see Due Diligence); and
- Our Critical Concerns Response Plan ensures that all suspected instances of modern slavery are escalated immediately to our Ethics and Regulatory Compliance team to be dealt with in an appropriate way (see Victim Support/ Incident Management).

# Risk assessment, prevention and mitigation

## 5.1 Understanding the Risks

We understand our risks and we make sure that we have appropriate systems in place.

The UK Director of Labour Market Enforcement stated that the construction industry is as at a high risk of modern slavery<sup>5</sup>. In addition, the government identified construction as a high-risk area for procurement in its modern slavery statement dated 18th September 2023.

In recognising this risk, we have developed our annual risk assessment programme to identify the key activities that increase the risk of modern slavery occurring within our business. The risk assessment is conducted by the Ethics and Compliance team in consultation with key stakeholders across the Group.

The risk assessment looks at key categories of risk identification including:

- Country risk;
- Sector risk;
- Supply Chain complexity risk;
- Workforce risk; and
- Materials risk.

As well as specific modern slavery scheme risks and vulnerable activities such as:

- Temporary labour;
- Management of third parties;
- Materials procurement;
- Recruitment;
- Mergers and acquisitions; and
- Incident management / victim support.

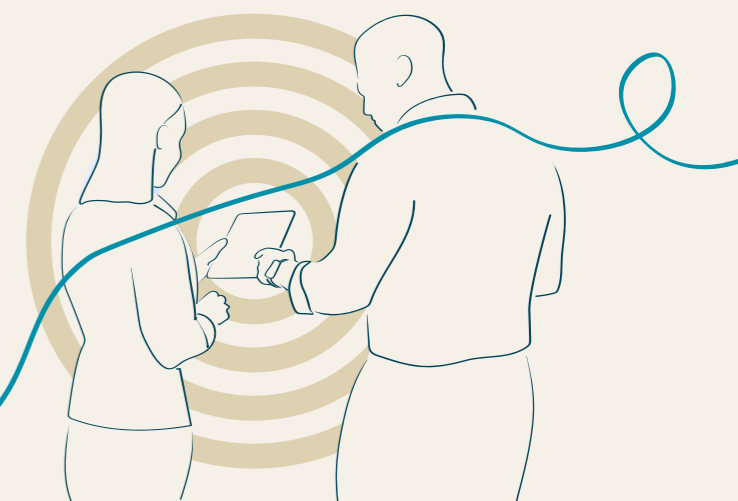
Our risk assessment process involves reviewing internal policies and procedures, consulting government guidance and reports (such as the US List of Goods Produced by Child or Forced Labour), conducting internal interviews and incorporating insight from our Ethics and Regulatory Compliance team.

Our 2025 risk assessment indicated that we have the following key risks:

- Widespread use of temporary labour;
- Complex Supply Chains and use of Supply Chain Labour; and
- Procurement of high-risk materials.

Further details on each of these risks is set out overleaf.

5 | <https://committees.parliament.uk/writtenevidence/129193/pdf/>



## 5.2 Temporary Labour and Supply Chain Labour

Widespread use of temporary or supply chain labour is a risk factor for any sector, but construction faces particular challenges<sup>6</sup>. Major projects are continually evolving, with subcontractors joining and exiting during different phases. Thousands of people could be involved over the lifecycle of one project, many supplied through a complex network of subcontractors and labour agencies.

Onsite, the worker demographic can fluctuate daily and there can be a lack of visibility of how temporary workers are being treated in the lower tiers of supply chains.

At any one time, Wates directly engages approximately 1,000 temporary workers via its own labour agencies. Around 50% of those are blue collar workers (a combination of skilled and unskilled tradespeople) and 50% white collar workers (a mix of skilled and unskilled administrative staff, project related roles).

Due to the nature of the work Wates undertakes, the Group also utilises a high volume of supply-chain labour. This labour may come directly through employment by sub-contractors, through sub-sub contractors, or through temporary labour which is sourced via the supply chain.

### Direct temporary labour

To mitigate the risks associated with the use of direct temporary labour, Wates has moved to a “neutral vendor” model. The neutral vendors act an intermediary between Wates and a panel of labour suppliers to facilitate the provision of workers to Wates. The neutral vendors are responsible for ensuring that requirements such as payment of national minimum wage and right to work obligations are in place with the suppliers.

Audits on compliance are carried out by the neutral vendor on the temporary labour agencies and strict criteria must be met before the labour agencies can be introduced to the panel.

All those who are engaged in the direct provision of temporary labour must act in accordance with our Anti-Slavery and Human Trafficking Standard.

We also ensure training on modern slavery is provided to our temporary workers via site induction training modules, posters and awareness campaigns.



### Supply chain labour

Supply chain layering can result in increased risk, due to the issues with visibility and control as the provision of labour moves further into the tiers of the supply chain.

To support with managing this risk, suppliers are required to meet the requirements of the Anti-Slavery and Human Trafficking Standard and to replicate this through their supply chain. The standard also places obligations on suppliers in relation to their use of labour agencies.

We also conduct due diligence (see Due Diligence) on our supply chain partners through the use of third-party screening, Constructionline accreditation and through internal questionnaires.

In 2025, we carried out a number of worker wellbeing audits in partnership with Unseen to identify key risks for workers on our sites.

These audits identified a number of key risk areas within our supply chain including:

- Right to work checks;
- Clarity and understanding of contracts and payment terms;
- Modern Slavery Awareness; and
- Awareness of Confidential and anonymous reporting routes.



To address these risks we have strengthened our processes by:

1. Exploring ways we can introduce secondary right to work checks as a mandatory process on site induction;
2. Delivering Toolbox Talks on worker rights including employment contracts, sick pay, holiday pay and deductions;
3. Sending communications to our Supply Chain reminding them of their obligations in accordance with our Supply Chain Standard which forms part of their contractual terms and conditions;
4. Meeting with key subcontractors to identify improvements to pay and overtime processes;
5. Refreshing our Modern Slavery Toolbox Talks and communication campaigns; and
6. Updating our whistleblowing posters and promoting of reporting mechanisms.

Work will continue to strengthen key controls as further Worker Wellbeing Reviews are conducted throughout 2026.



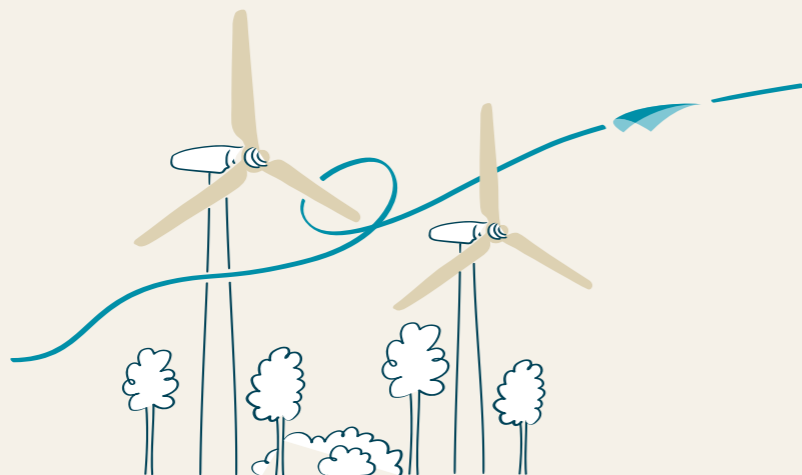
### Case study

## Solar Panel Procurement

In 2025, Wates undertook a focused supply chain mapping exercise for photovoltaic (PV) solar panels used on one of our public sector framework contracts, recognising the heightened modern slavery risks associated with polysilicon-based products.

The work involved tracing the supply chain down to at least Tier 3 including collecting and reviewing manufacturer documentation—such as Codes of Conduct, Modern Slavery Statements, and component provenance breakdowns—to evidence ethical sourcing and ensure transparency around high-risk materials.

This work demonstrated Wates' proactive approach to managing ethical risks, responding to client concerns, and strengthening procurement governance for high-risk renewable technologies.



## 5.3 Materials Procurement

As part of our assessment of risk we review “the US Lists of Goods Produced by Child Labor or Forced Labor” to identify potentially at-risk goods, for example bricks, garments, textiles, glass, granite, gravel and carpets.

As the Group continues to move more into the renewables market, the risks of modern slavery related to products such as solar panels and in particular the risks associated with polysilicon, continues to increase. Polysilicon is a key input in the production of solar modules, and nearly half of the world's solar-grade polysilicon comes from Xinjiang, a region in western China. There are well documented state-sponsored human rights abuses involving Uyghurs and Muslim minorities within Xinjiang and other parts of China. As a result of the known risk posed by solar panels, in 2025 we carried out a detailed supply chain mapping exercise relating to the procurement of solar panels on one of our public sector framework contracts (see Case Study).

To manage the risks in our supply chain the Group has a central list of around 250 – 300 preferred suppliers and relies predominantly on UK based distributors. Our Preferred Supply Chain Programme, which

accounts for approximately 70% - 80% of our procurement, allows us a more detailed assessment of our core suppliers' modern slavery risk.

For all our suppliers (even those outside of our Preferred Supply Chain Programme) we have a dedicated procurement and supply chain management team that regularly engages with our supply chain partners by way of briefings, updates and on-site visits. Our regional teams play an important role in supporting our modern slavery compliance, engaging with our suppliers and conducting factory visits to see how key products are being made. We have a factory visits report which asks questions about worker welfare such as whether workers are able to raise concerns, the working environment, and the standards applied, and provides observations on potential modern slavery indicators to be considered during the visit.

In 2026, we are planning to work with Unseen to carry out a comprehensive macro risk analysis of up to 2000 of our suppliers to develop an inherent risk rating and trend analysis. This will form the foundation of our supply chain mapping work for the future.

## 5.4 Recruitment

The Group has a recruitment process involving a combination of direct recruitment via an in-house function and by an external agency.

The Group uses an external third-party screening tool to conduct right to work checks and DBS screening. Depending on role, recruitment checks will also include background checks such as director disqualifications and adverse media checks.

A “day one” check was introduced for Wates employees in 2023 so that the employee has to present their passport on their first day at work to ensure that their identity matches.

Upon provision of bank account details for payroll purposes, the Group conducts a duplicate bank account check to identify where salaries may be being diverted to and controlled by others.

## 5.5 Mergers and Acquisitions

In October 2024, we acquired Liberty Group as part of the Wates Property Services business. Following the acquisition, a specific risk assessment was carried out on the Liberty business looking at the policies, procedures and practices, and any potential

modern slavery risks.

Following the acquisition Liberty's policies, procedures and training were amended to bring these in line with the rest of the Wates Group.

## 5.6 Victim Support / Incident Management

Our "Speak Up" whistleblowing programme allows our employees and any third parties the opportunity to raise concerns anonymously and confidentially. This can be done via phone, email or webform.

Our whistleblowing programme contains a "Critical Concerns" process. Employees are under an obligation to report serious compliance concerns through the whistleblowing channels. This includes any concerns about modern slavery. Employees must contact the Ethics and Compliance team through one of the following channels:

- [SpeakUp@wates.co.uk](mailto:SpeakUp@wates.co.uk)
- Safecall: 0800 915 1571
- [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

Reports can be made anonymously and the Safecall line operates 24/7 and reports can be made in over 40 languages. Concerns about Modern Slavery can also be made to Unseen's Modern Slavery & Exploitation Helpline.

All whistleblowing reports are assessed by the Ethics and Compliance team. Where a Critical Concern is reported this is escalated to the Ethics and Compliance Regulatory Group (ERCG) which includes the Head of Ethics and Compliance, Legal Director, Chief Financial Officer and Head of Internal Audit.

The ERCG will review the concern and develop an appropriate action plan. This will include:

- Assessing the severity of the concern;
- Deciding whether the police, regulatory

authority or other body should be informed;

- Agreeing what immediate steps are needed to protect individuals and preserve evidence;
- Determining what investigation / immediate remediation actions are needed; and
- Reviewing our relationship to the harm and what learnings can be taken.

Throughout the process, consideration is given to ensuring that reporters are protected from retaliation. In relation to modern slavery the ERCG will also handle the concern in accordance with the Modern Slavery Response and Remedy framework. This ensures that any response has victim-centred approach, providing access to remedy and to remediation of issues in the supply chain.

As well as whistleblowing we have in place a number of other mechanisms for reporting concerns, including a grievance policy for employees, an annual staff "Inpulse" survey and the StopGo app which allows workers to report health and safety or welfare concerns that they have identified on site.

StopGo is a purpose built app which allows anyone working on a Wates site to post observations. This can be done anonymously. StopGo is promoted at a site level and is automatically uploaded on to all Wates issued devices. The data is reviewed on a regular basis and feedback is provided to site teams and to supply chain members based on the observations recorded on the app.



### Case study

We were contacted through the Speak Up reporting line after an operative raised concerns about a sub-sub contractor who was engaged on one of our sites.

Concerns were raised that the sub-sub contractor engaged in unethical treatment of vulnerable individuals and operated business practices that were not in line with our professional standards. The reporter was concerned that their practices may indicate exploitation was occurring with their business.

The allegations did not relate to their conduct on our Wates site, but on other sites they operated on.

The matter was triaged by the Ethics and Compliance team who called an ERCG meeting to determine how the matter should be handled, and a plan was put in place in accordance with the Modern Slavery Response and Remedy Framework.

The sub-sub contractor continued to attend site and the Ethics and Compliance team worked with Unseen to arrange a reactive Worker Wellbeing Audit as soon as possible.

Additional controls were also put in place on site. This included additional right to work and identity checks, Toolbox Talks and additional communication and awareness materials being displayed on site. We also sent communications to our own supply chain about the Standards we expect and how it is their responsibility to ensure that these are passed down their own supply chain. Specific conversations were held with the sub-contractor who had engaged the sub-sub contractor about their due diligence practices.

Following the Worker Wellbeing review, no evidence of modern slavery was identified and no specific high risk concerns were raised, however a number of recommendations were made which were followed up with a remediation plan.

As the concerns raised related unethical behaviour on non-Wates sites, the information was also shared with the Modern Slavery and Exploitation Helpline.



# Due diligence



**We care about how we do business and who we do business with.**

## 6.1 Supply Chain

We adopt a risk-based due diligence approach in respect of our supply chain. We have mandated, where appropriate, that our suppliers be registered with the Constructionline validation system.

Constructionline offers an accreditation standard which is designed to streamline the construction procurement process by providing a unified set of questions for assessing suppliers. This standardisation of construction PQQs improves efficiency by reducing duplication and saving time and resources for both construction buyers and suppliers.

Constructionline provides different levels of accreditation for suppliers. Wates is a Constructionline Gold member which means we require our suppliers to meet the relevant gold accreditation criteria.

Constructionline asks specific questions regarding modern slavery and human trafficking legislation, policies and procedures as well as worker welfare rights such as national minimum wage compliance.

In addition, in 2023 we also enhanced our due diligence offering to include a regulatory compliance screening platform. This allows us to carry out due diligence on onboarding and then continuously throughout the life of the relationship. The screening platform will look for recorded regulatory compliance fines and breaches and will also identify issues such as adverse media reports.

In the event that red flags are indicated through the screening process, these are escalated to the Ethics and Compliance team who will review them and provide guidance to the Procurement and business unit supply chain teams on how to address the concerns. Typically, this will involve asking more specific and detailed queries of those in the supply chain to understand the issues that have occurred and how they rectified / remedied the issues. Where a modern slavery concern is identified, Wates would work with the suppliers and sub-contractors in accordance with our Modern Slavery Response and Remedy Framework with contract termination being a last resort.

In addition, as part of the Wates Management System to sub-contract works, we carry out a Plan Right exercise prior to execution. This involves a detailed discussion with the sub-contractor in respect of Health and Safety, Environment and Quality issues. This document also contains a section on modern slavery and asks the sub-contractor to confirm details of modern slavery policies and procedures and how the sub-contractor manages the supply chain.

Wates also uses Biosite biometric recognition technology on its sites to improve safety and security on site. Using biometric recognition helps to prevent identity switching with several workers sharing one set of documents. The Biosite induction process also involves CSCS card checks.

## 6.2 Recruitment

As well as pre-employment checks (see Risk Assessment, Prevention and Mitigation) we have in place a number of other due diligence processes to mitigate the risks of modern slavery. For example, we have worked in partnership with the Real Living Wage Foundation to become a real living wage employer and we display posters on sites to demonstrate our commitment to paying the real living wage. All employees are also provided with terms and conditions of employment and receive pay slips setting out their pay. Employees have day one identity checks and are subject to CSCS card checks to verify their identity.



### Effectiveness

Our compliance isn't about ticking boxes. It's about engaging in an effective way.

We assess compliance with our modern slavery action plan on an on-going basis throughout the year and monitor our KPI's and other focus areas through our Modern Slavery Steering Group.

We also monitor our whistleblowing programme, identifying where we receive reports and what they relate to. We also monitor key metrics such as number of reports received year on year, length of time taken to investigate and remediation outcomes.

In 2025 we carried out an audit of our temporary labour agencies which included modern slavery compliance. Through our temporary labour agency model (see Risk Assessment, Prevention and Mitigation) we will continue to develop a programme of audits in relation to management of temporary labour.

As part of our work with Unseen we also carried out four worker wellbeing site visits. These audits looked at:

- Responsible recruitment;
- Pay and fair reward;
- Managing working hours;
- Safe working conditions;
- Worker engagement;
- Modern slavery awareness; and
- On-site community.

We intend to carry out many more worker wellbeing site visits in 2026 across our Divisions, with five audits already scheduled for the first half of 2026.

# Training and awareness

**Our people are our strongest weapon in the fight against modern slavery, so we make sure that they know what modern slavery is and what to do if they spot it.**

Modern slavery training is a mandatory requirement for all our employees. Employees are required to complete modern slavery e-learning at the start of employment and then complete the training again every 2 years. We provide e-learning on the basis of the employee's role. This may be in the form of a traditional module with knowledge test questions and scenario-based learning, or through short videos. In both cases the modern slavery training covers:

- How big the problem is;
- What the Modern Slavery Act is;
- Responsibilities under the Act;
- What modern slavery is;
- How to spot the signs; and
- How to report it.

The modern slavery e-learning is managed by the Ethics and Compliance team in conjunction with the Learning and Development team. The content of the e-learning is reviewed by the Ethics and Compliance team on a bi-annual basis to ensure the content remains appropriate and up to date. The completion rates for training are reviewed monthly.

Modern slavery training is also supported by

our Code of Conduct e-learning. The Code of Conduct training is also mandatory for all employees on induction and is renewed every 2 years. This e-learning contains a scenario-based question around spotting the signs of modern slavery.

In 2025 we worked with Unseen to deliver specific training to our supply chain on modern slavery awareness and how to report a concern. In 2026 we plan to work with Unseen to provide specific targeted training to those in Procurement.

Modern slavery awareness is also included as part of our site induction process which is delivered to temporary workers and sub-contractors starting on site. This is delivered by site management teams as part of the health and safety induction and includes details of how to spot the signs of modern slavery.



In 2025 we supported Anti-Slavery Day with a communication and awareness programme including blog posts featuring details of the “Operation Cardinas” case study and sharing the “Concrete” video produced by Stronger Together and the CIOB. We also promoted a number of modern slavery resources on our intranet site, including posters, toolbox talks and links to external resources such as the Supply Chain Sustainability School Operational Toolkit. In addition, modern slavery awareness posters and whistleblowing information are displayed on our sites.


We also include the signs of modern slavery into our Visiting Manager's Report. This means that any senior leader visiting our sites must actively look out for signs of modern slavery as part of their visit and report any concerns.

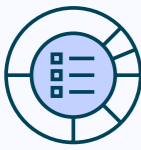
# Action plan for 2026


## Key Performance Indicators (KPIs)


**We are proud of the work that we have done, but we know there is always further that we can go. We always look for a better way.**

Our next steps in our plan to prevent modern slavery in 2026 are:

- 

To ensure 95% compliance with our modern slavery e-learning in all of our divisions.
- 

To complete a macro assessment of our supply chain risk (supported by Unseen) looking at factors such as 'geography', 'industry', and 'financial risk' to create a supplier and industry priority ranking by the end of Q2 2026.
- 

To review and update site induction training materials to enhance modern slavery awareness for supply chain operatives attending sites.
- 

To complete ten worker wellbeing site visits (supported by Unseen) by the end of 2026 with the outputs reviewed by the Modern Slavery Working Group to implement remediation actions and improve standards across the Group.

# Sign-off



**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Wates Group Limited and its Group Companies, including the following Group companies that have a turnover in excess of £36 million:**

- SES (Engineering) Limited
- Wates Construction Limited
- Wates Property Services Limited
- Wates Group Services Limited
- Liberty Group Investments Limited
- Liberty Gas Group Limited
- City West Works Limited
- Wates Residential Contracting Limited

**This statement has the support of the Board of Directors of Wates Group Limited and was approved on 14 May 2026 for the financial year ending 31 December 2025.**



**Head Office**

Wates House  
Station Approach  
Leatherhead  
Surrey KT22 7SW

Tel: 01372 861000

**Wates** 