

Taylor Wimpey plc
Slavery and Human Trafficking Statement – Modern Slavery Act 2015

1. Introduction

This statement is made by Taylor Wimpey plc on its own behalf and on behalf of the subsidiary companies listed on the final page. The board of each of the companies listed have approved this statement which is made in accordance with section 54 of the Modern Slavery Act 2015 (the MSA) and covers the financial year from 1 January 2016 to 31 December 2016.

Taylor Wimpey strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain and respecting human rights more generally is a fundamental part of our culture and values as an organisation. Taylor Wimpey welcomes and fully supports the implementation of the MSA and has and will continue to take its responsibilities under this legislation with the seriousness that it requires and deserves.

2. Background

Taylor Wimpey plc is a UK-focused residential developer which also has operations in Spain. As one of the largest residential developers in the UK, we are involved in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure which improves our customers' quality of life and adds value to the homes that we build. We are a national developer operating at a local level from 24 regional businesses across the UK, supported by a Head Office in High Wycombe.

Our UK regional business units directly employ approximately 4,800 people in total, carrying out a range of work from office based services to on-site building and development related activities which include trades such as bricklayers, carpenters, forklift drivers, painters, in respect of which we also hire a significant number of sub-contractors. Our business in Spain employs approximately 100 employees undertaking a similar range of work and builds homes both on the mainland and on the island of Mallorca.

Further information about our business and supply chains can be found in our 2016 Annual Report and Sustainability Report which can be found [here](#).

Taylor Wimpey is a constituent of the Dow Jones Sustainability Europe Index and the FTSE4Good Index Series.

3. Modern Slavery and Human Rights Working Party

In 2016, a team was appointed to assess the risks of modern slavery and human rights abuses occurring within our business and supply chains, with the primary initial focus being on modern slavery risks as defined in the MSA. The team is led by James Jordan, Group Legal Director and Company Secretary, and is made up of senior representatives from our Supply Chain, Human Resources, Legal, Investor Relations and Sustainability teams. The Working Party received assistance from Eversheds LLP.

4. Supply Chain Mapping

We have completed a detailed analysis of our supply chain which has established that we have over 6,800 different suppliers that are overwhelmingly UK based.

5. Risk Assessment

Based on the above analysis of our business and supply chain we have been able to identify areas of highest risk with our approach drawing on the United Nations Guiding Principles on Business and Human Rights.¹ This approach is based on an assessment of the risks of modern slavery occurring and to then

¹ The UNGP's are the authoritative global standard which provide a blueprint for companies to demonstrate respect for human rights and are reflected in the OECD, ISO26000, World Bank and Global Compact standards as well as being incorporated into country National Action Plans.

proactively “know” (identify and prevent) and “show” (disclose) the risks and any issues identified. We have therefore:

- Considered our current processes and protocols and assessed that there is currently a low overall risk of modern slavery and human rights abuses occurring in our own operations. However, the periodic use of temporary labour (including individuals directly employed by Taylor Wimpey and temporary labour sourced by our subcontractors) could represent an area of potential risk which we propose to address through the initiatives set out below (including but not limited to the training of our Commercial, Production and Technical Directors as well as for Procurement staff).
- Carried out a two-stage risk categorisation of our suppliers:
 1. Assessed and risk ranked them against criteria associated with their supplier type, geographies in which they operate and our expenditure with them. This provided us with an indicative risk ranking.
 2. Carried out a further analysis of the countries in which the suppliers operate and created a risk ranking based on the following indices (which provide assessments of risks of modern slavery occurring around the world):
 - a. 2015, US State Department-Trafficking in Persons and Workers Rights Report;
 - b. Global Slavery Index 2016;
 - c. Labour Exploitation legal resources and the Corruption Perceptions Index 2014.

6. Due Diligence

In order to minimise the risk of slavery and trafficking in our business and supply chains as far as is practicably possible, we have also commenced a detailed due diligence process in order to review the findings of our risk assessment and take steps to further embed our zero-tolerance approach to modern slavery and human rights abuses. Based on the risk assessment, initial due diligence efforts have focussed on the following categories of suppliers (Key Suppliers):

- Suppliers with whom we have the biggest financial outlay
- The following potentially higher risk supplier types:
 - Labour only suppliers (including recruitment, cleaning, bricklayers, carpenters and security);
 - Labour and material suppliers (including groundworkers, roof tilers and plasterers); and
 - Selected suppliers of raw materials which may be sourced from outside the UK.

We have written to 50 of our Key Suppliers across each of the above categories and asked them to complete a questionnaire focusing on modern slavery and their own processes. Analysis of the Key Supplier responses will be used, as appropriate, to develop future actions and the carrying out of further due diligence.

7. Slavery and Trafficking Policies

To further our commitment to combating modern slavery and trafficking we undertook a gap analysis review of our policies and procedures and following that exercise, we have:

- Implemented a new Anti-Slavery, Human Trafficking and Human Rights Policy which is published on our intranet site and can be found on our website [here](#);
- Implemented a new Supplier Code of Conduct;
- Updated the Procurement provisions in our Commercial Manual to place greater focus on the need to counter the risks of modern slavery and broader human rights abuses occurring in our business and supply chain;
- Updated our Supply Chain Policy to further emphasise the need to address the risks of modern slavery and human rights abuses within our business and supply chain.

During 2017, we will also be updating our whistleblowing policy to improve the likelihood of individuals reporting risks or instances of modern slavery to us or via our independent whistleblowing hotline administered by Safecall.

8. 2017 Objectives

In order to monitor and enhance the effectiveness of our approach to modern slavery and further embed our zero-tolerance approach to modern slavery and human rights abuses within our business and its supply chain, in addition to the Training referred to in section 9 below, during 2017 we propose to take the following steps:

- We will use the responses from our Key Suppliers to further risk rank our supply chain and steer our future actions which we anticipate will include:
 - Requiring all of our Key Suppliers to confirm that they will comply with our Supplier Code of Conduct;
 - Issuing further questionnaires to selected suppliers requiring them to detail the measures they have taken to address the risks of modern slavery within their own operations; and
 - Requiring selected suppliers to enter into new framework agreements with us that reinforce their commitment to adhering to our Supplier Code of Conduct.
- Reduce the risks associated with the periodic use of temporary labour by:
 - Requiring providers of temporary labour, as a minimum, to sign up to our Supplier Code of Conduct; and
 - Implementing training as referenced below.
- We will carry out audits of our own operations and on selected suppliers and will take appropriate actions based on the findings.
- Fully investigate and take appropriate action where modern slavery related events are reported to us directly or through our whistleblowing channels.
- Implement an Anti-Slavery, Human Rights and Human Trafficking policy in our Spanish business (which does not carry out any activities in the UK), taking into account local laws and regulations.

9. MSA Training

During 2017 we will provide training for our Commercial, Production and Technical Directors as well as for Procurement staff, so that they are able to engage with suppliers and identify risk factors in our business and supply chain and know the appropriate channels to report any incidents of actual or potential non-compliance. In addition, we will also undertake measures to generally raise the level of awareness of the Modern Slavery Act and Taylor Wimpey's zero-tolerance approach to modern slavery and human rights abuses across the business and its supply chain.

This Statement has been approved by the Board of Taylor Wimpey plc and in accordance with the requirements of the MSA it will be reviewed and updated annually.



James Jordan
Group Legal Director and Company Secretary – Taylor Wimpey plc
17 March 2017

COMPANIES ON BEHALF OF WHICH THIS S.54 MODERN SLAVERY ACT STATEMENT IS MADE:

1. Taylor Wimpey plc
2. Taylor Wimpey UK Limited
3. Taylor Wimpey Holdings Limited