

# 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 2017 to 31 December 2017.

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 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.

This is Taylor Wimpey's second statement and it will continue to be reviewed and updated annually in accordance with the MSA.

# 2. Our business

Taylor Wimpey 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 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 5,000 people in total, carrying out a range of work including office based functions and on-site building and development related activities which include trades such as bricklayers, carpenters, forklift drivers, and painters, in respect of which we also engage a significant number of sub-contractors. Our business in Spain is comparatively small in scale compared to the UK business, employing 85 people and undertaking a similar range of work and it builds homes both on the mainland and also on the island of Mallorca.

Further information about our business and supply chains can be found in our 2017 Annual Report and Sustainability Report which can be found here.

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

# 3. Modern Slavery and Human Rights Working Party

Prior to making our first statement in March 2017, a multidisciplinary team was appointed to oversee this important piece of work. The Working Party continues to meet regularly to ensure progress is made against our MSA objectives. 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, Company Secretariat and Sustainability teams.

# 4. Policies

We have reviewed and updated our Anti-Slavery, Human Trafficking and Human Rights Policy and it continues to be available to our employees on our intranet site and it can also be found on our website here.

During 2017 we also amended our Whistleblowing and Disclosure Policy to ensure that it improved the likelihood of individuals reporting suspected incidents of modern slavery to us directly or via our independent whistleblowing hotline administered by Safecall.

We also require all suppliers with a Framework Agreement with Taylor Wimpey to abide by our Supplier Code of Conduct which is issued to suppliers alongside the Framework Agreement. Our Supplier Code of Conduct sets out the slavery and trafficking principles which we expect our suppliers, contractors and business partners to uphold.

All relevant Policies and Procedures will continue to be reviewed and updated as necessary.

#### 5. Risk Assessment

We built on our Risk Assessment which was completed in 2016, and ensured that all suppliers had been categorised and risk-assessed accordingly. This has enabled us to review and prioritise the suppliers which we deem to potentially be higher risk compared to our other suppliers such as temporary labour providers and key labour trades used on our sites.

During 2017 we 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, during 2018, we will be looking to complete further work with suppliers which we have categorised as potentially being higher risk. Further details of our future actions in 2018 are included in Section 8 below.

# 6. MSA Training

In 2017, we sent a briefing note to all employees which set out our zero-tolerance approach to modern slavery and human trafficking in our organisation and supply chain. Also included within the briefing note were details on what modern slavery actually is; actions that Taylor Wimpey had taken in response to the MSA; possible indicator signs of modern slavery; and how employees can report any concerns that they might have.

We have also introduced two e-learning education modules which give employees the practical knowledge to enable them to engage with suppliers and identify risk factors in our business and our supply chain and know the appropriate channels to report any suspected incidents of modern slavery. It will be made compulsory for all our employees to complete both e-learning modules and our regional Managing Directors will be responsible for ensuring that this is done.

During 2018, the e-learning modules will also be included in our new employee induction process, which requires all new employees to complete the two modules within one month of starting with the Company. This will ensure that all employees will be aware of the risks of modern slavery and know the appropriate channels to report any suspected incidents.

# 7. Progress in 2017

In addition to the points listed above, in 2017 we have:

- Had no suspected incidents of modern slavery reported directly to us or via our independent whistleblowing hotline administered by Safecall;
- Updated our Framework Agreements to contain contractual provisions requiring all suppliers to
  adhere to all Anti-Slavery laws, our Anti-Slavery, Human Trafficking and Human Rights Policy and also
  our Supplier Code of Conduct which includes references to modern slavery offences. All existing
  suppliers were formally written to requiring them to agree to our Supplier Code of Conduct and agree
  to the clauses that we have now included as standard in our Framework Agreements;
- Updated our "Back of Order" standard terms and conditions, which are issued to all suppliers without Framework Agreements, so that they now include obligations with regard to modern slavery;
- Included questions in routine supplier audits on their approach to addressing the risk of modern slavery in their operations; and
- Implemented a MSA Policy in TW Spain (where it does not apply as a matter of law); and also included contractual provisions on modern slavery into all of their contracts.

# 8. 2018 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, during 2018 we propose to take the following steps:

- We will fully investigate and take appropriate action where modern slavery-related events are reported to us directly or through our independent whistleblowing channels;
- We will engage with suppliers mentioned above who we deem to be potentially higher risk in terms of supplier type. We will be issuing questionnaires to these suppliers requiring them to detail the measures that they have taken to address the risks of modern slavery within their own operations.
   We will work with any suppliers from whom we need to seek further assurances, to ensure that they are addressing the risk of modern slavery within their operations;
- We will engage with our key labour trades used on our sites to ensure that they are taking appropriate actions to reduce the risk of modern slavery occurring within their own operations and their supply chain. Where appropriate we will support them to raise awareness of modern slavery within their own business;
- Our Spanish business will conduct a Risk Assessment of their supplier base and will take further action based on the work that is being undertaken in relation to our suppliers in the UK;
- We will implement a new process whereby all new suppliers will be written to with a policy statement setting out our zero-tolerance approach towards modern slavery. We will also be requiring all new suppliers to complete a questionnaire which will enable us to risk assess each new supplier as and when they commence working with us;
- Our Internal Audit function will be piloting a specific 'Legislation Audit' in our regional businesses, in which compliance with the MSA will be included to ensure employees in each business are aware of this important piece of legislation;
- In the first half of 2018 we will be creating and distributing posters around our offices and sites with further details on how to report any incidents of modern slavery to ensure employees and our subcontractors remain vigilant to possible indicators of modern slavery and feel able to report them from a protected disclosure perspective under our whistleblowing policy and relevant legislation; and
- As described in Section 6 above we will include e-learning modules in the induction process for all new employees and require all existing employees to complete both e-learning modules.

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

James Jordan

James Jordan

Group Legal Director and Company Secretary – Taylor Wimpey plc

19 March 2018

# 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