

# **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

**This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year ended 31st July, 2018**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”) and sets down Weston Homes’ commitment to preventing slavery and human trafficking in our own business and our supply chains. We are alert to risks and our members of staff will report their concerns to Weston Homes’ management so that they can be acted upon to preserve the company’s zero tolerance approach to any form of modern slavery.

## **Overview of our Organisational Structure**

Weston Homes Plc is a leading property developer operating in the South East of England and divided into three Regional divisions. Each Region has its own management structures, supported by, and reporting into the Group Head Office located in Takeley, Essex..

## **Supply Chain**

Weston Homes’ supply chain is comprised of hundreds of third party suppliers, contractors and subcontractors on whom we rely to execute our development projects through the supply of goods and services.

Procurement of these third party goods and services is dealt with by each of the Regional divisions. Due diligence as to the third parties’ compliance with Weston Homes’ policies and procedures is managed by a central team based at Head Office, and is a continuous process.

## **High Risk Areas**

Some of Weston Homes’ suppliers, contractors and subcontractors are smaller businesses. Weston Homes recognises that these entities, along with their suppliers and subcontractors present the most risk to its business in relation to the Act.

Many of these risks are mitigated by enhanced due diligence being implemented, with particular focus on the Company’s top 20 Sub-Contractors. Landscaping, security and cleaning are trades identified generally as carrying a high risk and will be included in the due diligence process.

Some of the materials we use are procured from suppliers outside of Europe. We acknowledge there may be a higher risk in this area where human rights legislation may be less stringent. We use a specialist agency to visit and report to us on any potential supplier outside of Europe, to ensure that their working practices suit our strict business principles.

## **Weston Homes' Policies**

We recognise our moral and ethical responsibilities to do all we can to ensure that our business and supply chains are slavery free. In order to help achieve this we have a number of internal policies as well as the due diligence we carry out. The internal policies include those that govern and control Whistleblowing, Anti-Corruption and Bribery, Harassment and Bullying, Proof of Right to Work, Equality and Diversity and Modern Slavery.

## **Actions taken to Combat Modern Slavery**

### **Obligations on our suppliers - contractor assessment**

Weston Homes operates a supplier policy. We conduct due diligence on all new suppliers before allowing them to become a preferred supplier.

The confirmations the business requires from all preferred suppliers are:

- They have taken steps to eradicate modern slavery within their business;
- They hold their own suppliers to account over modern slavery;
- They pay their employees at least the national minimum wage/national living wage (as appropriate); and
- Weston Homes may terminate the contract at any time should any instances of modern slavery come to light.

### **Contract terms**

Weston Homes' standard supplier terms include an obligation on suppliers to obtain similar commitments from their suppliers.

### **Training and awareness**

Weston Homes will provide training for all of its staff so that they understand the signs of modern slavery and what to do if they suspect that it is taking place. Refresher training will take place at regular intervals when deemed necessary.

A strict 'right to work' procedure is followed by Site Managers when employing staff at our development sites.

### **Performance Indicators**

We will test the effectiveness of the steps being taken to ensure that our business and supply chains are slavery free, against:

- The number of reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practises have been identified; or
- The number of reports received from the business' supply chain to indicate that modern slavery practises have been identified.

To date, no reports have been received, but with the Company's enhanced due diligence procedures, raising further awareness of the Modern Slavery Act, this may change.

**Further steps to be undertaken**

If considered necessary, the company may ask certain suppliers to produce an annual slavery and human trafficking report, setting out the steps they have taken to ensure slavery and human trafficking is not taking place in any part of their business or supply chain.

This statement was approved by the Board of Weston Homes Plc on 18th December, 2018.

**Robert Weston**  
**Group Chairman and Managing Director**  
**18th January 2019**