

## **Modern Slavery and Human Trafficking Statement**

### Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps by which William Hare Group Limited ('William Hare') and other relevant group companies have taken to ensure that slavery and human trafficking is not taking place in it's own business and it's supply chain. This statement relates to activities during the financial year 2016/2017.

William Hare is committed to preventing slavery and human trafficking in it's corporate activities and to ensuring that it's supply chains are free from slavery and human trafficking.

## William Hare Business and Supply Chains

William Hare designs, manufactures and erects steel structures and operates across the world. It works in diverse markets including the gas, oil and petrochemical industries, mining, power generation and nuclear reprocessing, commercial offices, retail and leisure developments, design and build and infrastructure projects.

William Hare has it's head office in the North West of England and employs 2,000 people worldwide with operations in the UK, UAE and India. It's supply chains operate nationally and worldwide. The UK operation's suppliers are largely based in the UK and Europe with the suppliers to the UAE and India operations being based in the Middle East and Asia.

#### **Policies and Contractual Controls**

William Hare's policies reflect it's commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating it's business operations or supply chains.

It's internal policies include a Business Code of Conduct which makes clear to employees the standards expected of them in relation to their actions and behaviour when representing the organisation. It confirms that William Hare will conduct every aspect of it's business ethically with honesty, integrity and openness, respecting human rights and the interests of it's employees, clients, supply chain and third parties.

William Hare also has a Whistleblowing Policy which encourages employees, customers and other business partners to report any wrongdoing which extends to human rights violations like modern slavery and human trafficking. Any reports would be fully investigated and appropriate remedial actions taken.

It is also committed to ensuring that it's suppliers are aware of it's policies and adhere to the same high standards. William Hare's standard supplier contractual terms include obligations on suppliers to comply with the Modern Slavery Act. Suppliers who breach these obligations will face appropriate actions which could include termination of contracts.

### **Due Diligence and Risk Assessment Processes**

William Hare undertakes due diligence when taking on new suppliers and regularly reviews it's existing supply chain to assess which of it's own activities and those of it's supply chain represent the highest risks in relation to modern slavery and/or human trafficking. The assessment is based upon geography, the product purchased, supplier quality performance and the nature of the business transaction.

# **Modern Slavery Training**

William Hare is providing training to key employees to ensure that they understand the risks of modern slavery and human trafficking infiltrating the business and/or supply chains and can effectively operate the policies and procedures aimed at mitigating this risk.

## **Board Approval**

This statement was approved by the Board of William Hare Group Ltd on 31<sup>st</sup> January 2017.

David Hodgkiss OBE Chief Executive