

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 business activities and the processes we have in place, with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. The business is alert to risks, whatever the size, 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, dealing with developments in the North, South and East of the area in which it operates. Each Region has its own management structures, supported by, and reporting into the Group Head Office located in Takeley, Essex near to Stansted Airport. Weston Homes does not develop properties outside of the UK.

Supply Chain

Weston Homes’ supply chain is comprised of hundreds of third party suppliers, contractors and sub-contractors on whom we rely to execute our development projects through the supply, by these organisations, of goods and services. Each of these suppliers varies in size from large companies to individual tradesmen and is predominantly UK-based with some material suppliers based overseas

Procurement of these third party goods and services is dealt with by each of the Regional divisions, who utilise known suppliers, which can vary depending on location and market conditions. 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 sub-contractors are smaller businesses and are not required in law to make formal declarations relating to the Act. Weston Homes recognises that these entities, along with their suppliers and sub-contractors present the most risk to its business in relation to the Act in the UK. Many of these risks are mitigated by the enhanced due diligence being implemented at Head Office, with particular focus on the Company’s top 20 Sub-Contractors (measured by value of the business placed with them). Landscaping, security and cleaning are trades identified, within the construction industry generally, as being trades with a higher risk of modern slavery, so will therefore be on our radar.

With regard to materials the business uses in its developments, some of these are procured from suppliers outside of Europe, and Weston Homes acknowledges that there is a risk of modern slavery in this 'upstream' supply where human rights legislation may be less stringent. When the business engages with suppliers of materials outside of Europe who we have not used before, we arrange for a specialist agency in that country to visit our potential supplier to review their operations, as part of a due diligence exercise, to ensure that their working practises suit Weston Homes' strict business principles, and then provide the business with a report on their findings.

Given that many of Weston Homes' suppliers are long-standing, we are in contact with all such suppliers asking them to make the same confirmations to the business that it requires from new suppliers.

Weston Homes' Policies

Weston Homes recognises its moral and ethical responsibilities to do all it can to ensure that its business and supply chain is slavery free, and in order to help achieve this has a number of internal policies as well as the due diligence it carries out, as. 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, in due course, Modern Slavery.

Actions taken to Combat Modern Slavery

Obligations on our suppliers - contractor assessment

Weston Homes operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all new suppliers before allowing them to become a preferred supplier. The business reserves the contractual right to terminate any supplier contract in the event of a breach of any legislative requirement which includes modern slavery.

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
- The business 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

The business 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 at our development sites, and the Site Managers follow the guidance, given to them, when interviewing and employing individuals working on their site.

Performance Indicators

Weston Homes is able to report that the effectiveness of the steps being taken to ensure that slavery and/or human trafficking is not taking place within its business or supply chain would be tested 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