



MODERN SLAVERY STATEMENT

2015 / 2016

INTRODUCTION

The rapid rise in global migration contributes to the increased risk of slavery, servitude, forced labour and human trafficking – together known as Modern Slavery. Every business, irrespective of the industry in which it operates, faces the very real risk that Modern Slavery exists within its supply chains. Styles&Wood recognises that it is no exception.

Styles&Wood is committed to a 'zero tolerance' approach to Modern Slavery, and is working to continuously improve its response to the risk that Modern Slavery may exist within its supply chains – however small or seemingly insignificant such a risk may be.

We are working to eradicate the risk in a number of ways:

MANAGEMENT RESPONSIBILITY

Led by our Head of Supply Chain, we have established a Modern Slavery Risk Team who, together, have assessed, and will continue to assess, the risk of Modern Slavery along with appropriate responses to it. The team comprises managers from our Human Resources; Safety, Health, Environmental and Quality (SHEQ); and Legal functions.

Our Head of Supply Chain has engaged with organisations such as Stronger Together and BiTC, attending training and awareness events focussed upon tackling Modern Slavery within UK business. This understanding has subsequently informed the group procurement and buying policies.

OUR BUSINESS AND SUPPLY CHAINS

Styles&Wood provides project management and property management services to a variety of sectors, including commercial, retail, banking, healthcare and leisure. We subcontract many trades and services to third party organisations, and source all goods and materials (whether for our clients projects or for use by the business directly) through third party suppliers.

Working under the guidance and governance of our SHEQ team, our site teams are responsible for ensuring that basic labour standards and welfare facilities are in place on all our sites. We also ensure that similar labour and welfare facilities are in place at places of work managed by our supply chain through planned audits.

All of this is underpinned by a commitment to working in accordance with our corporate values.

HUMAN RESOURCE

The fluctuating demands of project-based work determine that we often need to rely on agency or temporary staff. Styles&Wood has relationships with a number of preferred supplier recruitment agencies.

Service level agreements are in place with each of these agencies which allows us better visibility on their methods of recruitment and management of human resource. The relationships with agencies are reviewed annually.

POLICIES AND CONTRACTUAL CONTROLS

Styles&Wood operates a Whistleblowing Policy. Although this is aimed principally at employees, it also extends to other workers and contractors. The policy encourages people to report any instances of wrongdoing or unethical behaviour without fear of reproach. The policy expressly includes matters associated with Modern Slavery. All concerns will be investigated in line with the policy and the company is committed to providing protection and support for whistle-blowers.

We are currently updating our procurement policy to ensure that it reflects Styles&Wood's approach to Modern Slavery in its supply chains and the importance that we place upon ethical trading. This updated policy will be signed off at director level.

We will also be taking the opportunity to update Styles&Wood's supplier terms and conditions to ensure that appropriate weight is given to prioritising ethics and eradicating modern slavery.

MANAGEMENT OF SUPPLIERS AND SUPPLY CHAIN

Taking into account the business sectors in which Styles&Wood operates, together with the results of internal risk assessments, we recognise that there is a moderate risk of Modern Slavery being a feature of our supply chains. Because of this, we have various mechanisms in place to seek to identify and assess the risk of Modern Slavery:

- All subcontractors appointed to support Styles&Wood operationally are assessed through a pre-qualification process which gathers information about our subcontractors’ business operations prior to any orders being placed or any works commencing on site.
- All site operatives are required to have the Construction Skills Certification Scheme card (or equivalent).
- Strategic subcontractors are subject to bi-annual formal review.
- “Health Checks” are carried out regularly to ensure that every subcontractor’s health and safety compliance is up to date.
- On site audits and inspections are also carried out regularly.
- Subcontractor forums and briefing sessions are carried out.
- Tender processes are carried out when appointing key suppliers of goods and services to the group.
- Key suppliers are audited with regard to health and safety, quality and environment together with pay and benefits.

We will look to enhance the parameters and applicability of these forums, audits and other processes over the coming year, to ensure that identifying and addressing the risk of Modern Slavery is a focus.

DUE DILIGENCE

Styles&Wood has recently invested in a third-party screening application which has enabled the streamlining of our approach to capturing basic information about our suppliers.

By issuing a tailored, automated risk-assessment questionnaire for completion by the supplier through an accessible online portal, Styles&Wood has been able to reach all its subcontractors and suppliers. The application analyses returns from third parties and automatically ‘red-flags’ circumstances which require further consideration or investigation.

Styles&Wood intends to repeat this due diligence annually.

MODERN SLAVERY TRAINING AND COMMUNICATIONS

Over the third and fourth quarters of 2016, we ran a poster campaign on our sites to raise awareness of Modern Slavery.

We are investing in electronic training to train all Styles&Wood employees on the subject of Modern Slavery. This will raise awareness within our business and underpin the company’s commitment to eradicating Modern Slavery within its supply chain.

MODERN SLAVERY RESPONSE PLAN

Styles&Wood has in place a Modern Slavery response plan which details the steps and measures that the company will take in the event of discovering evidence of Modern Slavery within its supply chain. The plan details how we will:

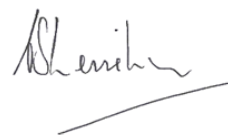
- Determine the appropriate enforcement body or victim support organisation to contact
- Protect and support at risk individuals
- Report to authorities
- Capture and protect evidence

CONTINUED COMMITMENT

Styles&Wood knows that the risk of Modern Slavery is dynamic and ever-evolving. For this reason, we intend to regularly review our approach to assessing and mitigating the risk of Modern Slavery.

This statement was approved by the Board of Styles&Wood Group plc

Signed



Tony Lenehan
Chief Executive of Styles&Wood Group plc