Modern Slavery Policy

We recognise that Modern Slavery is a serious crime, which encompasses slavery, servitude, as well as forced or compulsory labour and human trafficking. Our aim is to identify the risks, however small, in our business and in our wider supply chain, so even though our annual turnover is below the current £36 million threshold we have developed and published this policy statement to demonstrate our commitment to The Modern Slavery Act 2015.

Background

We are recognised as a leader in the provision of building surveying, cost management and project management services to the property and construction industries across the UK. We do not employ low-skilled foreign or domestic migrant workers (either directly or via recruitment agencies) and all potential employee's entitlement to work in the UK is checked during the recruitment process.

Wherever possible, we build long-term relationships with our suppliers, choosing business partners with standards and ethical practices compatible with our own. Our supply chain is not complex and typically involves the purchase of products and services from UK based suppliers to address two general requirements:

- Professional sub-consultant services, i.e. services we include in our deliverables (e.g. environmental services) or allow us to deliver the service commissioned (e.g. aerial platforms); or
- Products or services we need to provide a suitable work environment (e.g. facilities, equipment and support services).

Management System Approach

We have developed a series of integrated policies, protocols and procedures to make sure that we conduct our business in an ethical and transparent manner. This approach is outlined in the following policies and procedures:

- Anti-bribery.
- Anti-money Laundering.
- Environmental, Social and Governance (ESG).
- Recruitment Guidelines.
- Whistleblowing.

Supplier Due Diligence

We are committed to confirming that there is no modern-day slavery or human trafficking in any part of our business or our supply chain. We therefore routinely evaluate potential suppliers and re-evaluate existing suppliers to confirm they adhere to the Act, and in particular that:

- 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).

We reserve the right to immediately terminate the contract should any instances of modern slavery come to our attention.

Risk-based Approach

We use a risk-based approach throughout all our processes and procedures to help us identify and mitigate potential risks; this approach is enshrined in all our management systems.

Reporting Suspicious Activity

All employees and suppliers are encouraged to report any suspicion or knowledge of possible modern slavery to the Project Owner (the person with ultimate responsibility for delivering our service to the client) or the Account Manager (the person with ultimate responsibility for managing Watts' relationship with a supplier), as soon as they become aware of it.

The Owner/Account Manager will make reasonable enquiries to confirm/refute these suspicions, obtaining additional information and consulting with HR personnel as appropriate. Where necessary, the Owner/Account Manager will be responsible for bringing the concerns identified to the attention of a designated first responder (i.e. organisations that help support potential victims of modern slavery), so the case can be referred to the National Referral Mechanism (NRM).

Training and Awareness

All new employees undertake relevant training and are made aware of this policy and its content during their induction; existing employees are advised about any amendments made so they understand their ongoing obligations and undertake refresher training at routine intervals.

Policy Review and Audit

The Board is responsible for this policy statement who sees that it is periodically reviewed and amended as necessary to make sure it remains suitable and effective.

Signed:

Corrina Ralph
Managing Director
For and on behalf of Watts Group Limited