WILLIAM HARE GROUP LIMITED
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 its own business and its supply chain. This statement relates to William Hare's activities during the financial year 2022 which ended on 31st December 2022.

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

William Hare Business and Supply Chains
William Hare engineers, 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 its head office in the North West of England and employs approximately 1,700 people worldwide with operations in the UK, UAE, India and Portugal. Its supply chains operate nationally and worldwide. The UK and Portugal 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 its commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating its business operations or supply chains.

Its 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 its business ethically with honesty, integrity and transparency, respecting human rights and the interests of its 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 its suppliers are aware of its 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 its existing supply chain to assess which of its own activities and those of its supply chain represent the highest risks in relation to modern slavery and/or human trafficking. The assessment is based upon geography, the products purchased, supplier quality performance and the nature of the business transaction.

William Hare is a member of the Gangmasters & Labour Abuse Authority (GLAA) and agrees to the principles of the GLAA Construction Protocol.

Modern Slavery Training
William Hare provides 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.

Awareness-raising programme
As well as training staff, the organisation has raised awareness of modern slavery issues by distributing posters across the organisation's sites for educational purposes.

Board Approval
This statement was approved by the Board of William Hare Group Ltd on 30th January 2023.

Susan Hodgkiss.

Susan Hodgkiss
Chief Executive Officer
for and on behalf of ***William Hare Group Limited***
Dated: 30th January 2023