

The aim of this policy is to ensure that modern slavery or human trafficking is not taking place within our business or within our supply chain.

Walter Lilly structure, business and supply chain

Walter Lilly carry out construction work and facilities management involving science, higher education, high-quality private residential, restoration and structural refurbishment projects.

Modern Slavery can occur in many forms. For the purpose of this statement, modern slavery includes any act of slavery, servitude, bonded, forced or compulsory labour, child labour or human trafficking. All of these acts are conducted for either personal or commercial gain and result in the abuse and exploitation of an individual's human rights. Integrity is one of the core values of Walter Lilly and we remain fully committed to the eradication of modern slavery in all its forms. As a Company we do not engage in, nor do we condone or tolerate, any act of modern slavery within any aspect of our operations.

We expect all employees, subcontractors and suppliers to comply with the following provisions:

- Adhere to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibit any threat of violence, harassment and intimidation
- Prohibit the use of worker-paid recruitment fees
- Prohibit compulsory overtime
- Prohibit child labour
- Prohibit discrimination
- Prohibit confiscation of workers original identification documents
- Provide access to remedy, compensation and justice for victims of modern slavery

Walter Lilly are fundamentally a management company that employs a wide range of subcontractors to undertake the construction work on our projects. Walter Lilly have a formal supply chain process where the selection, appointment and future use of our subcontractors is managed. All employees, temporary workers, or subcontract employees, who work at any site or business location operated by Walter Lilly will be required to conform fully to the requirements of our Modern Slavery and Human Trafficking Policy and its supporting procedures. This includes reporting any suspected act of modern slavery identified within the workplace to their line manager and director for immediate investigation and action. We are committed to ensuring that there is no slavery or human trafficking in our supply chain and it is our policy to implement effective and robust controls to ensure this is not taking place. Our Supply Chain Contractor Qualification Questionnaire draws attention to the applicable legislation and demands that our supply chain partners comply in full with it.

We are committed to the highest standards of openness, probity and accountability and our staff are requested to report any suspicions of significant wrongdoing.

Walter Lilly only uses specified reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. We contact labour agencies on an annual basis and request that they verify and demonstrate their compliance with the Modern Slavery Act 2015.

Walter Lilly clearly communicates to employees the actions and behaviours expected of them when representing the organisation. The organisation strives to maintain the highest standard of employee conduct and ethical behaviour when managing its supply chain.

Walter Lilly's mitigation measures and due diligence

Walter Lilly implement mitigation measures to help ensure that modern slavery does not ever feature in our operations. The Modern Slavery compliance requirements are outlined within our Supply Chain Contractor Qualification Questionnaire, pre-order meeting minutes and subcontractor orders. We will never knowingly accept products and services from subcontractors and suppliers who exploit people or natural resources to create their products and services.

- Modern Slavery and Human Trafficking Statement (Ref [POL-COR-SLA](#))
- Contractor Qualification Questionnaire (CQQ) (Ref [FRM-BSC-CQQ](#))
- Subcontractor Pre-Order Agreement (Ref [MET-SUR-POR](#))

Risk management and continuous monitoring

Our primary risk area is within our supply chain. Therefore, achieving transparency of labour employment arrangements and sourcing of materials are areas of focus. Walter Lilly communicates and demonstrates our commitment to our supply chain using the pre-order procurement process and the Contractor Qualification Questionnaire. We engage with our supply chain as appropriate, to understand what measures they are taking to ensure that modern slavery is not occurring within their business or their own supply chain.

Walter Lilly takes a zero-tolerance approach to slavery and we are committed to ensuring that operations and supply chains are free from slavery or human trafficking.

Every employee will be familiar with our ethical standards and policies to ensure no slavery occurs within the business and are encouraged to report any potential breaches. Our statement is visible for all staff to view on the company's website and intranet as well as being provided during induction.

Training on modern slavery and trafficking

Walter Lilly draws attention to the Modern Slavery Act 2015 and requires our staff, subcontractors and suppliers to comply with its requirements, and our annual Slavery and Human Trafficking Statement is posted to the staff intranet.

Walter Lilly shall maintain an effective system for monitoring compliance with this policy which will be governed by the Director responsible for our supply chain. This policy will be reviewed annually on the 1st of October each year, as a minimum, by the HR department, the Director responsible for supply chain and the Managing Director.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015.

Target – 100% of Walter Lilly staff to have completed modern slavery training modules by 1st October 2025.

C. Butler

Chris Butler | Managing Director