



## Modern Slavery Act 2015: Voluntary Slavery and Human Trafficking Statement

### 1. Introduction

The Woodall Group and its subsidiaries (“we”) oppose slavery and human trafficking in all its forms. This statement sets out the steps we have taken in this financial year to ensure that there is no slavery or human trafficking in our business or in our supply chains, including

- Established a Working Group to develop a plan and review activity
- Further developed our due diligence questionnaire/T&Cs for suppliers and labour providers to include Modern Slavery and Human Trafficking checks
- Developed a Risk Register for logging, managing and reviewing risks associated with modern slavery
- Developed an escalation path in case of a suspected breach
- Delivered an awareness training session for our Directors and managers

### 2. About us

We are a small property development company specialising in building houses which reflect their surrounding environment. We operate within the construction sector.

Our annual turnover is under £36 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act 2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to identify risks and tackle modern slavery and human trafficking in our business and in our supply chains.

Our supply chains mainly consist of the following types of organisations:

Scaffolding	Smart Roofs
Bricklayers	General building supplies
Windows	Timber merchants
Joiners	Mortars, screeds and aggregates
Roofers	Plant hire and transport
Plasterers	Garage doors
Plumbing	Solar PV
Electrical	Office supplies, utilities and IT services
Mastic	Legal advisors
Insulation	Recruitment agencies
Tiling – ceramics wall and floor	Training companies
Painting	Workwear suppliers
Carpets	Estate agents
Cleaning	

### 3. Our People

Our recruitment processes are transparent and include confirmation of an employee’s ID and their right to work in the UK. We ensure that salary and wages are paid into a personal bank account and all employees are paid above the UK’s National Living Wage.

### 4. Our Policies on slavery and human trafficking

We have appropriate policies and procedures in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.



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Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We have the following policies and procedures in place relevant to modern slavery, which we continuously review and update:

- Whistleblowing policy
- Risk Register
- KPI record
- Annual Contract and Supplier Review
- Annual Board Review (of statement and KPIs including sign off)

Our website provides information about our core values and social standards:  
<https://woodallhomes.co.uk/about-us/>

### 5. Due diligence processes and risk assessment

To help identify and monitor the risk of slavery and human trafficking in our supply chain we have robust anti-modern slavery clauses in all our supply contracts to provide us with authority to act in-case of a breach.

Being in the Construction industry we consider the risk of slavery and human trafficking within our supply chain to be relatively high.

Therefore, we maintain a Modern Slavery Risk Register which outlines the key risk, its impact and the control procedures in place. This register is reviewed on an annual basis by our Modern Slavery Working Group and our Board of Directors.

We only employ agency and contract workers through reputable employment agencies that adhere to our anti-slavery and human trafficking policy (or equivalent policies).

Our Senior Quantity Survey and Senior Buyer are in charge of monitoring supplier and client compliance and ensuring the due diligence process is carried out.

### 6. Reporting concerns

Where signs of potential exploitation have been identified the following reporting process will be followed:

- Potential exploitation identified by an employee
- Employee informs the Construction Director or HR Manager
- The Construction Director supported by the HR Manager should assess the risk and will then follow the procedure below:
  - Call 999 if it is an emergency or someone is considered to be in immediate danger
  - If there is no immediate danger contact one of the following:
    - Local Police on 101
    - Gangmasters & Labour Abuse Authority on 0800 432 [0804/intelligenec@gla.gov.uk](mailto:0804/intelligenec@gla.gov.uk)
    - Modern Slavery & Exploitation helpline on 0800 121 700

### 7. In cases of a breach

Any potential breach which has been identified and reported will be taken seriously and we will follow the guidance provided to us by the relevant external agency.



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Consideration will be given to the ongoing engagement of a provider who has breached the principles of the Modern Slavery Act and their services/contract may be terminated.

We will work with the relevant authorities and agencies to support anyone working in our organisation who has been affected by modern slavery or human trafficking.

### **8. Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

### **9. Effectiveness in combating slavery and human trafficking**

We use the following measures to assess how effective we have been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- The number of suppliers and sub-contractors who have been issued with our Modern Slavery Statement and have committed to the requirement to comply
- The number of reported concerns in the past year
- Number of staff who have received training on identifying and addressing the risk of slavery and human trafficking in our business and supply chains

The KPI record is updated by the HR Manager and shared with the Board of Directors on an annual basis.

### **10. Further steps**

Following a review of the effectiveness of the steps we have taken in 2023 to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Create and deliver an Awareness training session for all Site Managers/Assistant Site Managers
- Introduce a Modern Slavery due diligence questionnaire when scoping potential suppliers or clients

This voluntary slavery and human trafficking statement is made for the financial year ending May 2024. It was approved by the Board on 28 March 2024.

A handwritten signature in black ink, appearing to read "Dave Wood", written in a cursive style.

Dave Wood  
Managing Director  
Woodall Group Limited  
Date: March 2024

