

MODERN SLAVERY STATEMENT 2018

For the Styles&Wood Group, incorporating Styles&Wood, Keysource, GDM, iSite, Arctick and Mobias

INTRODUCTION

Since Styles&Wood Group ("Styles&Wood") issued its first Modern Slavery Statement in 2017, the group has continued to build on the progress made during 2016 and 2017.

Because the group has grown in size through acquisitions, the focus of our work has been to review and extend the systems, governance and risk management which is already in place, to cover the new parts of the group. We know 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. We continue to work towards eradicating the risks in a number of ways:

MANAGEMENT RESPONSIBILITY

Our Modern Slavery Risk Team continues under the same leadership of our Head of Supply Chain. It remains a multi-disciplinary team comprising managers from our Human Resources; Safety, Health, Environmental and Quality (SHEQ); and Legal functions. Together, the team have extended the reach of the due diligence and governance across the enlarged group.

In 2018, Styles&Wood has also become a signatory to the GLAA Construction Protocol. This protocol brings together construction contractors to share best practice, and set standards for managing the risk of slavery within the construction industry specifically.

Our Head of Supply Chain also continues to engage with organisations such as Stronger Together, the Chartered Institute of Procurement & Supply and BITC so as to remain up-to-date with developments in the field, and the emerging thinking around risk management.

OUR BUSINESS AND SUPPLY CHAINS

Styles&Wood provides project management and professional 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. In order to manage our risk more effectively, we have

recently reduced the number of appointed agencies that can provide temporary resource to Styles&Wood. We have service level agreements in place which allow us better visibility on their methods of recruitment, together with their management of human resource. The relationships with temporary resource agencies are reviewed annually.

We have also undertaken audits with all our temporary resource agencies, to review their processes in relation to the risks of modern slavery.

Through our subcontractor audit process, we also review the temporary resource agencies used by our subcontractors - to ensure that they adhere to minimum industry standards. In addition, we provide advice to our supply chain, to ensure that they are better informed, and capable of managing the risk of modern slavery within their own supply chains more effectively.

POLICIES AND CONTRACTUAL CONTROLS

We have carried out a review of all relevant policies to ensure that they remain appropriate and fit for purpose.

Styles&Wood operates a Whistleblowing Policy. Although this is aimed principally at employees, it also extends to other workers and contractors. The policy expressly includes matters associated with modern slavery. We have recently rolled out training to all employees to raise awareness and understanding of whistleblowing.

Our procurement policy continues to reflect Styles&Wood's approach to modern slavery in its supply chains, and the importance that we place upon ethical trading.

Styles&Wood's supplier terms and conditions ensure that appropriate weight is given to prioritising ethics and eradicating modern slavery. We have also introduced a group procurement contract which we will endeavour to use whenever buying products or services for the group. This also features terms which give primacy to addressing the risk of modern slavery and the expectations that we have of our suppliers.

We have introduced a Statement of Ethics which now features on our websites. It addresses Styles&Wood's ethical standards including its requirements regarding modern slavery.

MANAGEMENT OF SUPPLIERS AND SUPPLY CHAIN

Our business model and the sectors in which Styles&Wood operates has not changed significantly over the last 12 months. Taking this into account, together with the results of further internal risk assessments, we remain of the view that there is a moderate risk of modern slavery being a feature of our supply chains:

We have various mechanisms in place designed to identify and address the risk of modern slavery:

- As our supply chain continues to grow and evolve, all subcontractors are subject to a due diligence process that is managed through an external portal. Suppliers are required to provide information on their processes and procedures in relation to minimising the risk of modern slavery within their businesses.
- 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. This includes confirmation relating to employee engagement with regard to health and safety issues and development of skills such as training.
- 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 to raise awareness of hot topics, including modern slavery. These sessions allow us to work with our key suppliers to drive improvements in processes and procedures on site relating to worker conditions and treatment.
- Tender processes are carried out when appointing key suppliers of goods and services to the group to ensure that we are engaging with ethical and suitable contractors.
- Key suppliers are audited in line with our internal due diligence assessments including health, safety, supply chain management and employee terms and conditions. The audit specifically reviews processes in place to minimise the risk of slavery within their own business and those of their supply chain.

MODERN SLAVERY TRAINING AND COMMUNICATIONS

All of our current employees have completed an e-learning course on modern slavery to ensure that they are aware of the risks, know how to identify the signs and what to do if they suspect a risk on their sites. This training includes familiarisation with the associated policies. All new employees are required to undertake the same training as part of our induction process.

We continue to provide information on all our sites in the form of the GLAA Workers Rights leaflets to ensure that our supplier's operatives are aware of their basic employment rights and what they need to do if they are concerned about their own situation or that of someone they work with.

MODERN SLAVERY RESPONSE PLAN

We have reviewed the Modern Slavery Response Plan, which remains appropriate given the nature and size of our business. This 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:

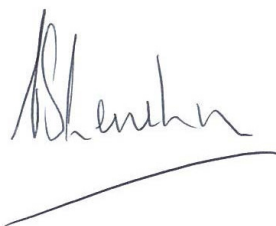
- Determine the appropriate enforcement body or victim support organisation to contact
- Protect and support at risk individuals
- Report to authorities
- Capture and protect evidence

CONTINUED COMMITMENT

Styles&Wood remains 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.

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

Signed



Tony Lenehan

Chief Executive of Styles&Wood Group and Director of Styles&Wood Group Limited