

WINVIC CONSTRUCTION LIMITED MODERN SLAVERY ACT SECTION 54 STATEMENT 2018

INTRODUCTION FROM SIMON HUNT – GROUP MANAGING DIRECTOR – ON BEHALF OF WINVIC CONSTRUCTION LIMITED

Winvic is absolutely committed to combatting slavery and human trafficking within its organisation and its supply chains and to ensuring that it does business in an ethical manner and with respect for its people and the communities in which they live. Winvic believes that this commitment will benefit its customers and other stakeholders affected by Winvic's activities. Winvic recognises, however, that it is but one link in a supply chain to the end user that is long and global. Therefore, it is essential that Winvic's suppliers also understand and appreciate the standards of business conduct that are expected of any company that does business with Winvic.

ORGANISATION'S STRUCTURE

Winvic is a leading multidisciplinary contractor that delivers construction projects on a national scale within the United Kingdom, and are widely known as the UK's leading 'shed' specialist, delivering millions of square feet every year for the industrial and distribution sector. Winvic was formed in 2001 and are based in Northampton in the UK. Winvic is a privately owned business who employ approximately 290 employees.

In the year end to January 2018, Winvic Construction Limited generated sales of £485 million.

WINVIC'S BUSINESS

Winvic's business covers the following key areas:

- Industrial and distribution buildings
- Fit-out – standalone and as part of a base build, including installing high value storage, complex MHE, and mechanical and electrical services
- Civil engineering, earthworks, remediation and infrastructure
- Multi-room student and residential accommodation
- Education, retail and leisure
- Commercial buildings.

WINVIC'S SUPPLY CHAINS

Winvic's supply chains include:

- Agency
- Distribution
- Procurement of goods & services
- Outsourcing
- Subcontracting.

WINVIC'S POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Winvic is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

Please see the link to [Winvic's Modern Slavery & Human Trafficking Policy](#) which reflect Winvic's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of Winvic's initiative to identify and mitigate risk it ensures that new suppliers must complete Winvic's Sub-Contractor Qualification Questionnaire prior to engagement in order to evaluate the risks of modern slavery and human trafficking. If deemed necessary, suppliers will be visited on site, and are re-audited on or around every 3 years to ensure adherence to Winvic's strict standards of ethically transparent supply chains.

All suppliers have been contacted to express Winvic's commitment to tackling modern slavery throughout our supply chains and have been provided with a copy of our Modern Slavery and Human Trafficking policy. A new clause has been added to Winvic's Standard Sub-Contract amendments and will be a condition precedent to any future sub-contractor appointments. Existing suppliers also have their Sub-Contractor Qualification audited and renewed every 3 years.

Winvic is also taking steps to put in place systems to:

- Monitor potential risk areas in its supply chains.
- Protect whistle blowers.

TRAINING

Throughout the year to date a thorough training programme has been rolled out to ensure all our staff have a high level of understanding of the risks of modern slavery and human trafficking in Winvic's supply chains and its businesses.

We are able to report 100% of Winvic staff have undertaken the training programme.

WINVIC'S EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Winvic are developing the following means to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its businesses or supply chains:

- Business function reports -
 - Winvic supplier prequalification questionnaire completed.
 - Standard subcontract amendments included.
 - Supplier renewals reviewed.
- Internal staff training and induction processes – 100% achieved.
- Winvic's suppliers are obliged conduct due diligence and audit their own supply chains and report on the findings – All suppliers sent the Winvic statement and Modern Slavery and Human Trafficking Policy annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Winvic's slavery and human trafficking statement for the financial year ending January 2018.

Simon Hunt
Winvic Group Managing Director

On behalf of the Directors of Winvic Construction Ltd
August 2018