

## Taylor Wimpey plc Slavery and Human Trafficking Statement – Modern Slavery Act 2015

### 1. Introduction

This statement is made by Taylor Wimpey plc on its own behalf and on behalf of Taylor Wimpey UK Limited. The Board of each company has approved this statement which is made in accordance with section 54 of the Modern Slavery Act 2015 (the MSA) and covers the financial year from 1 January 2022 to 31 December 2022.

Taylor Wimpey strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain, and respecting human rights more generally is a fundamental part of our culture and values as an organisation. Taylor Wimpey fully supports the implementation of the MSA and has and will continue to take its responsibilities under this legislation with the seriousness that they require and deserve.

This is Taylor Wimpey's seventh statement and our commitments will continue to be reviewed and updated annually in accordance with the MSA.

## 2. Our business and supply chain

### **Business model**

Taylor Wimpey is a UK-focused homebuilder which also has operations in Spain with an annual turnover of £4.4 billion. Our purpose is to build great homes and create thriving communities.

As one of the largest homebuilders in the UK, we are involved in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure, which improves our customers' quality of life and adds value to the homes and communities we build.

### **Organisational structure**

We are a national developer operating at a local level from 22 regional business units across the UK, supported by a Head Office in High Wycombe. Our UK regional business units directly employ approximately 5,140 people in total, carrying out a range of work including office-based functions and on-site building and development related activities. This includes trades such as bricklayers, carpenters, forklift drivers, and painters. Our business in Spain is comparatively small in scale compared to the UK business, employing 96 people on average during the year and undertaking a similar range of work; it builds homes both on the mainland and on the islands of Mallorca and Ibiza.

We also engage a diverse contractor labour force. In 2022 we provided employment for approximately 11,100 contractors through over a thousand contractor companies. All employees are paid at least the voluntary living wage, as calculated by the Living Wage Foundation, except for trainees and trade apprentices who are paid in accordance with the apprentice rates set out in the Construction Industry Joint Council Working Rule Agreement. In 2021 we became an accredited Living Wage Employer, meaning that all our directly employed staff and all those working for us via a contractor or service company are paid at least the real living wage, as set by the Living Wage Foundation.

## Supply Chain

Our UK operations are supported by our Manufacturing and Supply Chain business which incorporates both an internal logistics business, a newly announced Timber Frame business and our Group Procurement team, who are responsible for letting National contracts, which play an important part in our supply chain management and procure over 95% of our housebuilding materials.

During 2023 we plan to expand our timber frame activities with a new facility in Peterborough that will help fulfil our goals to increase timber frame usage on our sites and improve visibility and security of supply, offering both operational and environmental benefits.

Further information about our business and supply chain management can be found in our 2022 Annual Report and Accounts and our 2022 Sustainability Supplement and ESG Addendum which can be found here.

Taylor Wimpey is pleased to be a constituent of the Dow Jones Sustainability Europe Index and the FTSE4Good Index Series.

#### 3. Policies and due diligence

Our Anti-Slavery, Human Trafficking and Human Rights Policy; and our Whistleblowing Protected Disclosure Policy; are each reviewed regularly to assess whether any changes are required. Both Policies are available to our employees on our intranet site and can also be found on our website here.

We have an independent third-party whistleblowing hotline which can be used by our employees and contractors to report any concerns that they might have around modern slavery or human rights more generally. Details of the hotline and our whistleblowing procedures are published and promoted at all of our sites.

We have an Employee Code of Conduct which includes a section on Human Rights and the MSA. The Code of Conduct is intended to ensure our employees understand how we operate as a Company, and also how we require our employees to conduct themselves, in order to uphold our values.

We also require all suppliers with a Framework Agreement in place with Taylor Wimpey to abide by our Supplier Code of Conduct. The Supplier Code of Conduct is issued to suppliers alongside our Framework Agreement. Our Supplier Code of Conduct sets out the antislavery and trafficking principles which we require our suppliers, contractors and business partners to uphold and requires them to respect workers' human rights and prohibits all forms of modern slavery. Our employment and recruitment agencies and other third parties supplying workers to our organisation are also required to comply with our Code of Conduct.

We are committed to treating suppliers and contractors fairly and paying on time. Our standard payment terms for suppliers are to pay by the end of the following month after receipt of invoice. E-invoicing is available for certain suppliers. The payment terms for contractors are 37 days from the relevant date. We have self-billing arrangements in place for contractors which automate and speed up the invoicing and payment process. This can be particularly important for small firms working with us. We ensure that appropriate compliance checks are taken with regard to temporary staff and labour on our sites.

All relevant Policies and Procedures will continue to be reviewed regularly and updated as necessary to reflect our business processes, best practice and compliance with the law.

# 4. Risk assessment

We have worked on improving our supplier risk process for a number of years and as a result our visibility and understanding of our supply chain has increased considerably. For 2023, MSA, along with RLW and Sustainability form an integral part of our Partner supplier quarterly business reviews. We are also developing our approach to environmental and social risks in our supply chain, integrating disclosure requirements into our tender processes for key group suppliers. We considered our current processes and protocols and assessed that there continues to remain a low overall risk of modern slavery and human rights abuses occurring in our own operations.

Our digital tender system, which is available across the business, enables us to capture information from our supplier and contractor base at the point they submit a tender to us. The supplier and contractor are required to answer questions to enable us to understand the measures that they have taken to address the risks of modern slavery and human rights abuses within their own operations. This allows our Commercial teams to seek further assurances to ensure suppliers and contractors are addressing any perceived or known risk of modern slavery within their operations. We have introduced this system to give greater assurance in these areas, which will be further developed during 2023 to the point where from 2024 its use will be mandatory throughout the business and it will not issue a tender to a supplier that is unable to meet our MSA requirements.

# 5. MSA Training

We have two e-learning modules currently available across the Company, which give employees the practical knowledge needed in order to engage with suppliers appropriately on this subject and to identify risk factors in our business and our supply chain, and also to know the appropriate channels to report any suspected incidents of modern slavery.

These e-learning modules are included in our employee induction process, which requires all new employees to complete the two modules within one month of starting their employment with the Company. By requiring all new starters within the business to complete the modules we aim to ensure that all employees are aware of the risks of modern slavery, capable of identifying potential risks, and know the appropriate channels to report any suspected incidents. The e-learning modules continue to remain appropriate.

Our onboarding process for Commercial and Procurement employees ensures that they understand how to engage with suppliers to identify risk factors associated with modern slavery.

# 6. Our Spanish business

As mentioned above, Taylor Wimpey has operations in Spain. The MSA does not apply as a matter of law in Spain, however our Spanish business has its own MSA Policy in place and contractual provisions on modern slavery included in all contracts with their suppliers, and complies with applicable Spanish and EU legislation.

# 7. Progress in 2022

During 2022, we:

- Had no suspected or actual incidents of modern slavery reported directly to us or via our independent whistleblowing hotline administered by Safecall;

- Reviewed our Safecall posters and their use, and ensured that our employees and our sub-contractors remained vigilant to possible indicators of modern slavery, were able to identify potential risks themselves and knew how to report a suspected incident of modern slavery;
- Continued to review suppliers' and contractors' tender submissions submitted via the digital tender system and worked with any suppliers in respect of whom we needed to seek further assurances before they could be accepted as a supplier;
- Continued to review our Business Units' use of the appointed recruitment outsourcing firm and considered whether it was appropriate to make their use compulsory;
- Continued to engage with the key labour trades used on our sites to ensure that they were taking appropriate actions to reduce the risk of modern slavery occurring within their own operations and supply chain. Where appropriate we supported them in raising awareness of modern slavery within their own business; and
- Continued to keep our practices, procedures and training programmes under review to ensure their continued effectiveness.

## 8. 2023 Objectives

In order to monitor and enhance the effectiveness of our approach to modern slavery and further embed our zero-tolerance approach to modern slavery and human rights abuses within our business and its supply chain, during 2023 we propose to take the following steps:

- Review our previously undertaken risk assessment to ensure it remains valid and to ensure that we are focusing our due diligence processes appropriately. This will include a greater understanding of suppliers' potential financial stress;
- Develop a standardised annual programme of supplier audits;
- Continue to engage with the key labour trades used on our sites to ensure that they are taking appropriate actions to reduce the risk of modern slavery occurring within their own operations and supply chain. Where appropriate we will support them to raise awareness of modern slavery within their own business;
- Continue to keep our practices, procedures and training programmes under review to ensure their continued effectiveness;
- Continue to fully investigate and take appropriate action if any modern slaveryrelated events are reported to us directly or through our independent whistleblowing channels;
- Continue to review suppliers' and contractors' tender submissions submitted via the digital tender system and work with any suppliers in respect of whom we need to seek further assurances before they can be accepted as a supplier;
- Developing the digital tender system to ensure that all Regional businesses can implement it for all new tenders from the start of 2024 and mandating its use from that point;

- Monitor visibility of our Safecall posters and their use, and ensure that our employees and our sub-contractors remain vigilant to possible indicators of modern slavery, are able to identify potential risks themselves and know how to report a suspected incident of modern slavery; and
- Monitor our Business Units' use of the appointed recruitment outsourcing firm and consider whether appropriate to make use compulsory.

This Statement has been approved by the Board of Taylor Wimpey plc and Taylor Wimpey UK Limited and in accordance with the requirements of the MSA it will be reviewed and updated annually.

**Jennie Daly, Chief Executive** Taylor Wimpey plc 25 May 2023

COMPANIES ON BEHALF OF WHICH THIS S.54 MODERN SLAVERY ACT STATEMENT IS MADE:

- 1. Taylor Wimpey plc
- 2. Taylor Wimpey UK Limited