

INTRODUCTION

Walter Lilly & Company Ltd is committed to the prevention of Modern Slavery and Human Trafficking and will not tolerate or condone any such identified act within any aspect of our business activities.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, it sets out the activities undertaken by the Company in respect of the prevention of Modern Slavery and Human Trafficking and constitutes the Company's annual statement for the financial period 1st October 2017 to 30th September 2018.

ORGANISATIONAL STRUCTURE

Walter Lilly & Company Ltd provides construction and engineering services for private customers. Our work is conducted solely in the United Kingdom, focussed in London and the home-counties and is delivered by a directly employed management team and third party supply chain partners, all of whom are fully eligible to work within the United Kingdom.

SUPPLY CHAIN

Given the nature of our organisational structure and our use of a UK based Supply Chain, we consider that any exposure to the risk of Modern Slavery or Human Trafficking is extremely low and that should any risk exist it is most likely to be within the extended Supply Chain. We work closely with the primary members of our Supply Chain in the identification of such risk, to ensure it is addressed in an appropriate manner.

MODERN SLAVERY POLICY

Walter Lilly & Company Ltd has implemented a comprehensive policy in slavery and human trafficking which is available using the following link www.walterlilly.co.uk. This policy and its supporting procedures detail our business approach to the prevention of Modern Slavery and Human Trafficking, along with the processes used to support and deliver our commitment. This policy and commitment has been communicated to our staff and our Supply Chain partners for their information and action.

We operate a risk based approach to the identification of Slavery and Human Trafficking, the principle of which is based on the location of the product or service, industry sector, supplier relationships and existing data held. This is further supported by additional information and guidance obtained from, but not limited to, sources such as the Global Slavery Index, Corruption Perceptions Index and US Department of Labour Lists of Goods and Suppliers.

DUE DILIGENCE AND IDENTIFICATION OF RISK

Walter Lilly & Company Ltd's direct employment of its staff is supported by robust processes which ensure that an individual's identity is confirmed and they have a legitimate right to work in the United Kingdom. This policy and the right to work checks undertaken by our HR department minimise the risk of employing forced labour, or those who may be subject to human trafficking.

Where Walter Lilly & Company Ltd do utilise labour only sub-contractors, we are introducing due diligence checks to ensure that, as a minimum, labour providers comply with our commitment to the Prevention of Modern Slavery and their processes for recruitment contain no illegal labour practices.

Notwithstanding that Walter Lilly & Company Ltd's Supply Chain is primarily UK based, we have instigated a risk assessment of supply chain activities to identify and prioritise any areas which may pose a risk of Modern Slavery. Such activities may include:

- Any extended supply chain subcontractors working in an industry based in an overseas territory which is known to be impacted by modern slavery issues.

COMMUNICATION AND TRAINING

Walter Lilly & Company Ltd commitment to the prevention of Modern Slavery and Human Trafficking emanates directly from our Board of Directors. Their leadership and commitment to this important social issue has been clearly communicated both internally to employees and externally to our supply chain partners.

All employees have been made aware of the Company's commitment to the prevention of Modern Slavery and Human Trafficking and are familiar with the existence of our Policy and Procedures in this regard.

We acknowledge that we are in the early stages of a long term process and our approach to the Prevention of Modern Slavery and Human Trafficking will undoubtedly evolve year on year. We will utilise our annual statements to reaffirm our continued commitment and communicate this evolution, including the steps we have taken and will continue to take to deal with this socially important issue.



Managing Director | Walter Lilly

MODERN SLAVERY

Modern Slavery is a crime which occurs in many forms and for the purpose of this policy includes any act of slavery, servitude, bonded, forced or compulsory labour, child labour or human trafficking. All of these acts are normally conducted for the purposes of either personal or commercial gain and without exception result in the abuse and exploitation of an individual's human rights.

Walter Lilly & Company Ltd is fully committed to the eradication of Modern Slavery in all its forms and as a Company we will not engage in, nor will we condone or tolerate, any act of Modern Slavery within any aspect of our operations.

As a Company we will act transparently, ethically and with integrity both internally and across all of our business relationships. Appropriate action will be taken in response to any identified act of Modern Slavery and the processes and control measures we implement in support of this policy aim to prevent, in so far as we are able, the opportunity for acts of Modern Slavery to arise.

Our approach to Modern Slavery, including our control measures, is contained within our supporting procedures. However as a minimum we will:

- Identify and prioritise which if any parts of our business and Supply Chain are at most risk of Modern Slavery so that we can focus on those areas
- Communicate our commitment to our Supply Chain using the Preorder procurement process and the Contractor Qualification Questionnaire and engage with them, as appropriate, to understand the measures being taken by them to ensure that Modern Slavery is not occurring within their business.
- If there is a perceived risk, introduce and implement appropriate due diligence activities which enable us to confirm, to the fullest extent possible, that Modern Slavery is not occurring within our Supply Chain
- Prepare and publish on our Company website an annual Modern Slavery and Human Trafficking Statement which details the steps being taken to support the prevention of Modern Slavery within our business and our Supply Chain
- Through appropriate communication raise employee awareness of Modern Slavery

All employees, temporary workers, or subcontract employees, who perform work at any site or location operated by Walter Lilly & Company Ltd will be required to conform fully to the requirements of this policy and its supporting procedures. This includes reporting any suspected act of Modern Slavery identified within the workplace to either their Line Manager or the HR Team for investigation/action.

This policy will be reviewed annually, as a minimum, to ensure its continued effectiveness.



Managing Director | Walter Lilly