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1. Introduction

- 1.1 Henry Boot PLC and its group companies have welcomed the introduction of the Modern Slavery Act 2015 (the "Act"). The aim of the Act is in line with our own 'Henry Boot Way' Vision and Values, as updated in 2017, which include 'Respect', 'Integrity' and 'Collaboration', all of which are relevant to our approach as set out in this document. For this reason, we applaud any measures which seek to bring about greater transparency and scrutiny into our various supply chains, in order to combat slavery and trafficking activities. In accordance with the legislation, this Statement takes into account the introduction of various measures throughout our supply chain management from 2016 onwards, with the aim of reducing the risk of slavery and trafficking activities being present within our business operations. It also sets out additional activities that have been carried out in subsequent years following the first introduction of our modern slavery approach, to add greater rigour and scrutiny to those measures.
- 1.3 We have been working with our partners, contractors and suppliers to bring any necessary changes into effect, and then to review their effectiveness and consider any changes or additional measures which such a review highlights. We are committed to improving our practices through these activities, and through improvements identified in future years, to combat slavery and human trafficking.

2. Organisational Structure and Business

- 2.1 Henry Boot PLC is the parent company of the Sheffield-based Henry Boot group of companies and is one of the UK's leading and long-standing property investment and development, land development and construction companies. The Group has approximately 450 employees and operates in the United Kingdom only.
- 2.2 The Group has a global turnover of over £300million.
- 2.3 This Statement addresses the measures put into place by Henry Boot PLC and its group companies and subsidiaries, comprising:
- Henry Boot Construction Limited
 - Henry Boot Developments Limited
 - Hallam Land Management Limited
 - Banner Plant Limited
 - All other subsidiaries and joint venture companies, both above and below the £36m turnover requirement in the Act.

Our Group comprises a number of subsidiary companies and joint venture companies, some of which do not exceed the £36m annual turnover threshold in their own right. However, the Henry Boot Group is looking to embed best practice in all of its operations. This Statement and the accompanying Anti-Slavery Policy will therefore apply equally to all of our Group companies.

3. Our Supply Chains

- 3.1 Our supply chains include:
- Consultants and advisers
 - Contractors and sub-contractors

- Suppliers of goods, supplies and materials for all stages of the construction cycle
- Suppliers of plant and machinery

3.2 We have identified the following areas of the supply chain as comprising the highest risk of slavery and trafficking activities:

- Human trafficking – in circumstances when using sub-contracted labour forces, where coerced/trafficked gangs may be present.
- Slavery and human trafficking – in circumstances when using materials such as 'conflict minerals' (tantalum, tin, gold or tungsten), steel, or other raw materials being predominantly sourced from countries with poor records on slavery and human trafficking.

4. Our Policies on Slavery and Human Trafficking

4.1 We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects 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. The practical measures we have taken and will be taking throughout our Group operations are reflected throughout this Statement and our Anti-Slavery Policy, and will be built upon and developed throughout the coming years to incorporate best practice into our operations.

5. Due Diligence Processes and Supplier Adherence

5.1 We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our Values, we have in place a supply chain compliance programme.

5.2 As part of our initiative to identify and mitigate risk we have put the following measures into place:

- Contacting existing suppliers and sub-contractors to ask them to confirm their adherence to our Anti-Slavery Policy.
- Ensuring that new suppliers and sub-contractors undertake to comply with our Anti-Slavery Policy through use of due diligence questionnaires and relevant contractual provisions, with appropriate termination provisions for failure to comply.
- Ensuring that the high-risk areas as identified under paragraph 3.2 are kept under regular review to determine whether additional and/or targeted measures are required within our supply chain to combat the risk of slavery and trafficking.
- Ensuring that our whistleblowing procedure is drafted sufficiently widely to encourage whistleblowing in relation to any identified breaches of our Anti-Slavery Policy.
- Inclusion of anti-slavery requirements within our Sustainable Procurement Charter.
- Inclusion of modern slavery and human trafficking risk on all Group company risk registers for monitoring going forwards, to be reviewed every six months in accordance with Group practice.

- Production of a supplier briefing pack and site information pack with posters to publicise the issue of modern slavery and how to report it.
- Production of a pocket guide, “toolbox talk” and posters which provide short-form information on identifying and reporting modern slavery, for distribution throughout the Group and to relevant sub-contractors and suppliers.
- Ensuring that supplier audits are capable of being carried out in the event of the report of a potential issue relating to human trafficking or slavery.
- Introduction of mandatory Group-wide e-learning on the topic of modern slavery.
- Active subscription to the Gangmasters & Labour Abuse Authority’s (GLAA) Construction Protocol ensuring that we work collaboratively with the GLAA to share information that will help stop or prevent the exploitation or abuse of workers.
- Participation in the Construction Works and Associated Services Modern Slavery assessment and implementing any areas for improvement.
- Taking steps to introduce a Service Level Agreement for responding to suspected Modern Slavery incidents.

5.3 These measures are required in order to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

6. Compliance

6.1 The personnel responsible for compliance with this Statement and the Anti-Slavery Policy, and for updating and improving our procedures in forthcoming years, shall consist of involvement from the following departments:

- Legal
- Human resources
- Procurement
- Management Services

7. Training

7.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we shall be implementing a series of training to all of our staff, highlighting the requirements of the Act and our Anti-Slavery Policy, and its practical application within our Group businesses. In 2021, we rolled out mandatory eLearning for all employees within the Group to carry out. This includes Modern Slavery as a whole but also a short form of eLearning specific to the operations within our business.

8. Measuring Effectiveness

8.1 We used the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- 100% of existing sub-contractors and suppliers on our approved list to commit to our updated due diligence questionnaire confirming their compliance with our Anti-Slavery Policy
- 100% of new sub-contractors and core suppliers to confirm via our due diligence questionnaire that they will comply with our Anti-Slavery Policy
- 100% of new supplier and sub-contractor contracts to contain provisions requiring compliance with our Anti-Slavery Policy.

8.2 Our performance against these KPIs during the period up to the end of 2021 is as follows:

- 100% of existing subcontractor and core supplier contracts have committed to our updated due diligence questionnaire confirming their compliance with our Anti-Slavery Policy.
- 100% of new core supplier and sub-contractor contracts have contained anti-slavery provisions since the clauses were introduced in January 2017 (90 new subcontractors, consultants and professional service providers were added to our approved list in 2020).
- In addition, 100% of existing land development consultants and professional legal advisers have been contacted to ensure that the required anti-slavery provisions are retrospectively incorporated into their appointments.

9. Ongoing Review

9.1 This Statement and the Anti-Slavery Policy will be subject to regular and ongoing reviews (at least annually) to ensure its effectiveness, and to update the requirements where further measures are identified.

T.A. ROBERTS
Chief Executive Officer
Henry Boot PLC
February 2022