

WINVIC CONSTRUCTION LIMITED MODERN SLAVERY ACT SECTION 54 STATEMENT 2024

INTRODUCTION FROM SIMON HUNT – GROUP CHAIRMAN – 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 and civil engineering projects on a national scale within the United Kingdom. Specialising in the design, build, and fit-out of industrial, multi-room, and commercial developments, Winvic also excels in the delivery of large-scale, complex civil and infrastructure schemes for both public and private sector clients. Formed in 2001, Winvic is a privately owned business based in Northampton in the UK, who employed 561 people to January 2024.

In the year end to January 2024, Winvic Construction Ltd generated sales of £959m.

WINVIC'S BUSINESS

Winvic's business covers the following key areas:

- Industrial, distribution and logistics 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

WINVIC'S SUPPLY CHAINS

Winvic's supply chains include:

- Agency
- Distribution
- Procurement of goods and 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 reflects 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.

Winvic's Whistleblowing Policy encourages the reporting of concerns and the protection of whistleblowers.

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 Prequalification and Compliance process – through Alcumus SafeContractor - 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 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 undertake checks on new recruits to ensure they are eligible to work in the UK.

Winvic has taken steps to put in place systems to:

- Monitor potential risk areas in its supply chains.
- Standardise Terms and Conditions for the supply of services from an employment business to Winvic (agency and freelance)
- Investigate Right To Work checks for anyone attending a Winvic Construction site through our Biometrics system.

TRAINING

Winvic maintained a level of 100% of existing staff trained and new employees trained during week 1 induction. New employees to January 2024 totalled 118.

The aim of the training is to ensure all our staff have a high level of understanding of the risk of modern slavery and human trafficking in Winvic's supply chain and its businesses.

WINVIC'S EFFECTIVENESS IN COMBATting SLAVERY AND HUMAN TRAFFICKING

Winvic has developed 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.

Winvic has also taken steps to put in place the following:

- Business function reports –
 - Roll out of a new, Supply Chain Prequalification and Compliance process through Alcumus SafeContractor.
 - Standard subcontract amendments included.
 - Supplier renewals reviewed.
- Internal staff training and induction processes – 100% achieved.
- Winvic's suppliers are obliged to conduct due diligence and audit their own supply chains and report on the findings – all suppliers are sent the Winvic statement and Modern Slavery and Human Trafficking Policy annually.
- Winvic's online training and development platform, which allows for e-learning for refresher and updated training and awareness modules for all Winvic employees. We hope to extend this to our supply chain partners, freelance and agency staff.
- Raising awareness onsite through Toolbox Talks, posters and recognising Anti-Slavery Day.
- Undertaking site assessments and audits in conjunction with developer clients.

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 2024.

Simon Hunt

Chairman Winvic Group

On behalf of and approved by the directors of Winvic Construction Limited

October 2024