

Contents

1.	Introduction.....	2
2.	Organisational Structure and Business.....	2
3.	Our Supply Chains.....	3
4.	Our Policies on Slavery and Human Trafficking.....	3
5.	Due Diligence Processes and Supplier Adherence.....	3
6.	Compliance.....	4
7.	Training.....	4
8.	Measuring Effectiveness.....	4
9.	Ongoing Review.....	4

1. Introduction

1.1 Henry Boot PLC and its group companies welcome the introduction of the Modern Slavery Act 2015 (the "Act").

1.2 The aim of the Act is in line with our own Values of:

- Respect for the individual
- Integrity
- Excellence
- Innovation

and 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, which will be most effective at reducing the risk of slavery and trafficking activities being present within our business operations.

1.3 We look forward to 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 initial 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 approaching £200million.

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 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. As part of our initiative to identify and mitigate risk we will be carrying out the following activities during 2016 and beyond:

- 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.

5.2 These systems have been put in place 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.

8. Measuring Effectiveness

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

- 75% 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.

9. Ongoing Review

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

John Sutcliffe
Chief Executive Officer
Henry Boot PLC
January 2017