

INTRODUCTION

Willmott Dixon is one of the UK's largest privately-owned construction, housing and property groups. Since 1852 we have always encouraged the adoption of high standards of corporate behaviour and been mindful of the social, economic and environmental impact that our activities have on others.

Corporate behaviour is naturally determined by individual behaviour and the responsibilities we assume. These include our responsibilities towards the communities and environments in which we operate, toward our employees, customers, supply chain, business partners and society in general.

If we adopt high standards, individually and collectively, then we can expect to maintain a sustainable, prosperous business. This might be reflected in our customer satisfaction levels, in our success in winning and retaining contracts, in our supply chain relationships, in our business reputation, and ultimately in our financial success.

All of the standards set out in this document are embedded in our policies and procedures, and supported by our management systems.

We seek to work with individuals and organisations which share our values and which will operate in accordance with our Code of Business Ethics.



RICK WILLMOTT

Group Chief Executive

WILLMOTT DIXON HOLDINGS LIMITED

Date:
2015

Customer Focus

We invite feedback from customers, clients and stakeholders in order to help us improve what we do. All complaints and compliments are reported monthly and reviewed at a senior level.

Being a Good Neighbour

As founder and corporate members of the Considerate Constructors Scheme (CCS) we will continue to strive to avoid creating nuisance from our operations. Our people will be courteous and sensitive in how they behave, interact and work in neighbourhoods, clearly aligning our commitment to sustainable development and investment in the communities in which we work.

Bribery and Corruption

We are committed to acting professionally, fairly and with integrity in all our dealings and relationships. Our employees, and those working on our behalf, will not offer, promise or pay to anyone, or request, agree to accept, or receive bribes – or otherwise breach applicable laws on bribery and corruption.

Competition

We comply with UK and EU competition law, and are committed to preserving free, fair and efficient competition.

Tax

We are committed to building open relationships with tax authorities and to following a policy of full disclosure in order to effect the timely settlement of our tax affairs and to remove uncertainty in our business transactions.

Transparency

In line with our corporate values we value honesty and integrity. We demonstrate our openness and transparency through annual public reporting of our external audited and verified sustainability achievements, social impact and financial performance.

Collaboration

We collaborate with industry peers and supply chain partners through our membership of reputable, respected and professionally run industry bodies in order to share best practice, enhance industry perception, increase training and raise industry standards.

Supporting our Supply Chain

All goods, works and services are procured in line with our Sustainable Procurement Policy. This requires us to ensure that the materials and services we use on behalf of our clients are responsibly, sustainably and ethically sourced in line with the United Nations Global Compact principles, as well as providing the best value. We will, wherever possible, provide opportunities for small and medium sized enterprises in the local area of a project or contract to increase local spend and benefit the local economy.

As one of the first contractors to sign up to the Government's voluntary Prompt Payment code, we are committed to ensuring that fair contract prices and terms are applied and respected. A flexible and transparent early-payment scheme is available for our Category "A" suppliers, which enables them to access their payments two weeks early.

We help our suppliers to improve their sustainability skills and knowledge through mechanisms such as the Supply Chain Sustainability School, of which we are a founding member.

Health and Safety

Safeguarding the health, safety and welfare of all of those involved in, or affected by, our activities is of paramount importance. We maintain industry leading metrics and key performance indicators across our Health and Safety reporting. Our Health, Safety and Welfare Policy is reviewed several times a year and is robustly implemented through our accredited OHSAS 18001 certified health and safety management system. Everyone should expect working environments which are safe, with minimal risk to health. We promote an 'All Safe' culture where health and safety is everyone's responsibility. We use industry recognised certification and accreditation schemes that allow individuals to demonstrate their competence.

Protect and Preserve the Environment

We recognise that our activities have the potential to affect both the natural and the built environments, now and in the future. We discharge our activities and duties in a responsible manner, in line with our policies, to afford protection to the environment by complying with all relevant environmental legislation.

We continually seek to minimise the impact of our operations by reducing our carbon emissions intensity and construction waste intensity, and by maximising diversion of waste from landfill. We choose to offset any remaining carbon emissions and have been carbon neutral since 2012.

Employment Practices/ Developing our People

We place the wellbeing of our people at the heart of our company. We monitor staff turnover and retention levels, and develop an annual action plan in response to our staff engagement survey, achieving world class engagement scores.

We are committed to ensuring that our employees receive the training, career development, challenges and recognition they deserve. All our directly employed staff can expect an annual performance review, a personal development plan and appropriate development activities. We actively encourage the attainment of professional qualifications and membership of professional organisations, such as the Chartered Institute of Building or the Royal Institution of Chartered Surveyors. We promote from within where we can.

We regularly benchmark our employment packages against industry averages and continuously review our benefits offering. We support the Construction Industry Joint Council (CIJC) in relation to all matters associated with the CIJC Working Rule Agreement for the Construction Industry regarding an employer's responsibilities to its employees, including terms and conditions, and pay rates and allowances.

Equality, Diversity and Inclusion

As an equal opportunities employer, we believe that the diversity of our workforce brings fresh ideas, experiences and perspectives to our business and builds complementary teams. We aim at all times to treat each other with fairness, dignity and respect in line with the protected characteristics under the Equality Act 2010. We welcome applications from those with the right mix of talents and skills. We will not tolerate or condone any form of discrimination.

Whistleblowing

As part of our commitment to the highest standards of quality, probity, openness and accountability, we have a whistleblowing policy which encourages any employee with concerns about suspected wrong doing to raise these with their manager, their MD, COO, DCE or the CEO without fear of reprisal. They can be confident that these will be thoroughly investigated and dealt with.

Data Protection/Confidentiality

We recognise the need to treat personal information about individuals in accordance with their rights and in line with regulations including the Data Protection Act 1998.

Political Engagement/Lobbying

We do not favour any one political party, nor do we make political donations to any party, or authorise donations by employees on our behalf. We do believe in 'speaking up' and actively lobbying where we believe a change in policy is in the best interests of our society.

We usually do this in collaboration with industry peer groups, through membership of bodies such as Build UK, the Aldersgate Group and the UK Green Building Council, which all campaign for a more sustainable future. We also seek to influence public policy by supporting the campaigning and lobbying of social enterprises, charities and action groups which share our values.