

## **VolkerWessels UK Modern Slavery Act Compliance Statement**

### **Introduction**

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes the VolkerWessels UK (VWUK) compliance statement for the financial year ending 31 December 2016.

### **1. Purpose**

This statement sets out VWUK's actions to understand the potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking, forced labour or exploitation in its own business and those of its supply chain.

VWUK is a leading multidisciplinary contractor that delivers innovative engineering solutions across the civil engineering and construction sectors including rail, highways, airports, logistics, marine, energy, and environmental infrastructure.

VWUK recognises that it has a responsibility to take a robust approach to slavery and human trafficking in support of human wellbeing and is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and associated practices.

### **2. Responsibilities under the Act**

It is the responsibility of all VWUK personnel, particularly those focussed on our procurement and operational site teams, to maintain VWUK's duties in respect of the Modern Slavery Act 2015. Directors and senior managers hold special responsibilities to hear and support those raising concerns in compliance with the Act and our related [whistle blowing policy in respect of our integrity policies](#) and the bribery act.

### **3. Operations and high risk activities**

VWUK currently operates in the United Kingdom and the Falkland Islands. The following are the processes by which VWUK assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking:

We carry out supplier assessment for services and goods in accordance with our responsible procurement policy through pre-contract checks, including those for prequalification and tendering, using a range of evaluation criteria including risk assessment of slavery or human trafficking. Regular audits may be undertaken for suppliers or sub-contractors considered high risk.

We have identified that higher risk activities may include supply chain contingent labour often supplied via labour agencies or gangmasters and the provision of consumables and materials from EU and non-EU sources, including countries with emerging economies or suppliers with extended supply chains.

Primary mitigation for these risks includes:

- Working with our supplier prequalification partners (Constructionline and Achilles RISQS), complimented by in-house vetting procedures
- Close site supervision of supply chain workforce, particularly those from labour agencies
- Training with regular updates for managers and appropriate key personnel to recognise and act upon any concerns regarding the possibility of modern slavery and human trafficking in the business

#### **4. Reporting**

VWUK has internal reports on all measures pertaining to supply chain assessment, vetting and review. Where a member of staff or our supply chain has concerns on issues of forced labour, exploitation, hiring practices or human rights they should contact their line manager **or** the VWUK executive compliance officer using the confidential whistle blowing telephone line– 01992 305 118. We are committed to reporting incidents to the relevant authority where concerns are identified and proven.

To request a copy of any of our policies, [please contact us here](#).

#### **5. Due diligence**

VWUK undertakes due diligence when considering new suppliers, and through regular reviews with its existing supply chain. Such due diligence includes:

- Mapping the activities of VWUK and those of our supply chain broadly to assess particular product or geographical risks associated with modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier including seeking an annual statement of compliance from our important supply chain and in addition an audit for the highest risk service providers
- Creating risk profiles for higher risk suppliers and services through expenditure reports
- Developing improvement plans with any suppliers that have no apparent awareness or policy, and subsequently taking a strong stance with suppliers or sub-contractors paying little attention to modern slavery and human trafficking including, as necessary, termination of a business relationship

#### **6. Compliance actions taken in the 2016 financial year**

- Amendments to question set/ process published by our supplier accreditation partners
- KPIs established to monitor these responses providing support and advice to those suppliers needing a relevant policy/ statement or further advice
- Referencing the Modern Slavery Act 2015 in our responsible procurement policy and other key documents

## 7. Compliance actions planned for the 2017 financial year

- Staff training and awareness through 'e learning' training modules to staff involved in appointing, managing or supervising supply chain organisations and toolbox talks on-site to understand the basic principles of the Modern Slavery Act 2015
- Conduct physical audits of suppliers and service providers in high risk categories that do not satisfy our checks identified in section 3 or cannot satisfactorily answer accreditation question sets and ensure an agreed action plan and policy is put in place
- Reinforcing procurement practices that influence our supply chain and are designed to prevent purchases at unrealistic prices, the use of labour offered at unrealistically low wages or below a country's minimum wage, or the provision of products that do not meet UK and European standards
- Continued staff support to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources for the training of key personnel
- Provide leadership and offer continued business relationship incentives and guidance to our supply chain, business partners, clients and contractors to implement and refresh anti-slavery policies

Dated 3 March 2017