

## Modern Slavery Act transparency statement

June 2023



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# Introduction

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery Act Transparency Statement for VolkerWessels UK Limited, and all its subsidiaries ("VWUK"), for the financial year ending 31 December 2022.

VWUK is committed to conducting its business to the highest legal and ethical standards at all times and is dedicated to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain. It also imposes the same high standards on its suppliers, and sub-contractors.

This statement sets out the steps we have taken to prevent modern slavery and human trafficking happening in our business and supply chain and outlines the measures we have and are putting in place to continue to reduce the risk of this happening in the year ahead.

We have and will continue to publish our modern slavery statement on the UK Government's modern slavery statement registry.



# Structure of the organisation

VolkerWessels UK 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. VolkerWessels UK employs over 3,800 staff and has business operations throughout the UK.

Our supply chain consists of around 5,000 suppliers. Most of our supply chain is UK based. However, directly and indirectly, we purchase a small amount of materials and services (less than 1%) from each of Europe, North America and Asia.



# Risk and compliance

VolkerWessels UK regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its own business and its supply chain. It does this both internally, by working together with leadership teams from all VolkerWessels UK businesses to identify any risk hotspots, and externally as a partner of the Supply Chain Sustainability School.

We are an active member of Build UK, and we collaborate with other leading businesses within our sector to share best practice and provide guidance to supply chain school members on issues such as modern slavery and supply chain mapping. We risk assess our supply chain based on the type of goods or services provided, their location, relationship and annual spend.

We do not tolerate slavery and human trafficking in our supply chain and have signed up to the Gangmasters and Labour Abuse Authority's (GLAA) Construction protocol as part of the GLAA industry wide initiative to eradicate modern slavery in supply chains. We require all suppliers to adhere to anti-slavery provisions in their contracts with us as well as our Group Responsible Procurement Declaration. Where we identify a potential risk with a supplier, we review our relationship with them and take appropriate action. As part of our commitment to monitor and reduce the risk of slavery occurring within our supply chains, we have adopted the following procedures:

- We use our accreditation partners supplier pre-qualification systems, through our membership of RISQS and our gold membership of Constructionline, with improved analytics, to conduct validation checks on all suppliers and assess their credentials in relation to a number of issues including adherence to the Modern Slavery Act. These checks complement our in-house vetting process which includes a risk assessment on all of our spend categories.

- We promote the idea of supply chain visibility and the preference for the workforce to be engaged directly where possible and practicable.
- We instruct external parties to conduct audits of our supply chain partners to check compliance.
- Where a non-compliance is found, we review our relationship with the relevant supplier and take appropriate action.
- Where we source products from outside of Europe, this is generally done through businesses that are registered in the UK, and that have robust policies, and policies for auditing their own high-risk suppliers.
- We use Supply Chain Sustainability School guidance and methodology to gain transparency and further understanding of risks when working with complicated supply chains.

## Modern Slavery Working Group

In 2022, we set up a Modern Slavery Working Group in line with the commitment we made in our 2021 statement. The Modern Slavery Working Group brings together our procurement leads, HR and Legal Directors to discuss the risks faced by our business of modern slavery, any new developments, and review whether any further measures and controls are required and action accordingly.



# Due diligence

We acknowledge that modern slavery could possibly take place both within our own workforce and within our supply chain. However, we consider that the risk of modern slavery occurring within our own workforce is low due to the right to work checks we carry out and other robust processes and procedures we have in place, including as follows:

## **Internal due diligence**

We carry out pre-employment checks within our workforce, including right to work checks, on all new directly employed employees in accordance with Government requirements. We actively support the direct resourcing of employees.

## **External due diligence**

We have a preferred supplier list and internal controls for our resourcing partners who provide candidates for both permanent roles and our directly employed temporary workers. We have robust contracts with these preferred suppliers which include anti-slavery provisions, as well as our obligations to adhere to our Group Responsible Procurement Declaration.

All suppliers must agree to comply with the Modern Slavery Act and if not already in place, implement adequate measures to manage modern slavery risks.



# Policies

VWUK have a number of policies, procedures and controls in place to help ensure we operate an open, honest, responsible, and ethical business. The policies include our integrity policy and our whistleblowing policy.

Our whistleblowing policy provides our employees, suppliers, and subcontractors with a confidential 24/7 hotline and a dedicated mailbox, where any concerns around any suspected malpractice can be reported.

We are implementing a specific Modern Slavery Policy to enhance our existing policies and procedures in this area.

We expect our supply chain to adopt all our integrity suite of policies and adhere to the same high standards as us. We also ask each member of our supply chain to adhere to our Group Responsible Procurement Declaration.



# Training

Training is essential in helping to combat modern slavery. We invest in educating our employees to recognise the risks of modern slavery and human trafficking in our business and supply chains, through our mandatory online modern slavery training and toolbox talks.

Through the training and workshops, employees are informed of the key signs that indicate that an individual may be a slavery or trafficking victim and are encouraged to report any suspicions of slavery and human

trafficking. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate this from our business and supply chain.

We host regular forums for our suppliers that focus on sustainable procurement, including educating and sharing best practices around modern slavery awareness, and other responsible actions underpinned by our procurement policies.



# Next steps

<b>INTERNAL</b>	Raise further awareness of the signs of modern slavery and our reporting procedure in our site induction process.	Use the principles outlined in BS 25700 to further improve our modern slavery measures and controls.	Continue with modern slavery and human trafficking awareness campaign, using on-site posters, magazine articles, e-learning and toolbox talks to further embed modern slavery awareness within the VolkerWessels UK group.	Implement a modern slavery specific policy.
<b>SUPPLY CHAIN</b>	Review opportunities to implement an interactive portal for our supply chain to communicate our policies, including our modern slavery policy.	Use the recommendations and guidance for sustainable procurement from ISO 20400 to drive improvements in our supply chain.	Conduct further audits of our suppliers to ensure they are adhering to the Modern Slavery Act and have adequate procedures in place to combat modern slavery.	Increase our labour assurance level whereby strategic labour suppliers are required to hold RISQS/ Constructionline Gold and also increase our assurance level for materials/plant supply to Constructionline bronze/silver.

This document has been approved by the Board of Directors  
of VolkerWessels UK – June 2023.



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