

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

June 2021



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 of its subsidiaries ('VolkerWessels UK'), for the financial year ending 31 December 2020.

VolkerWessels UK 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.

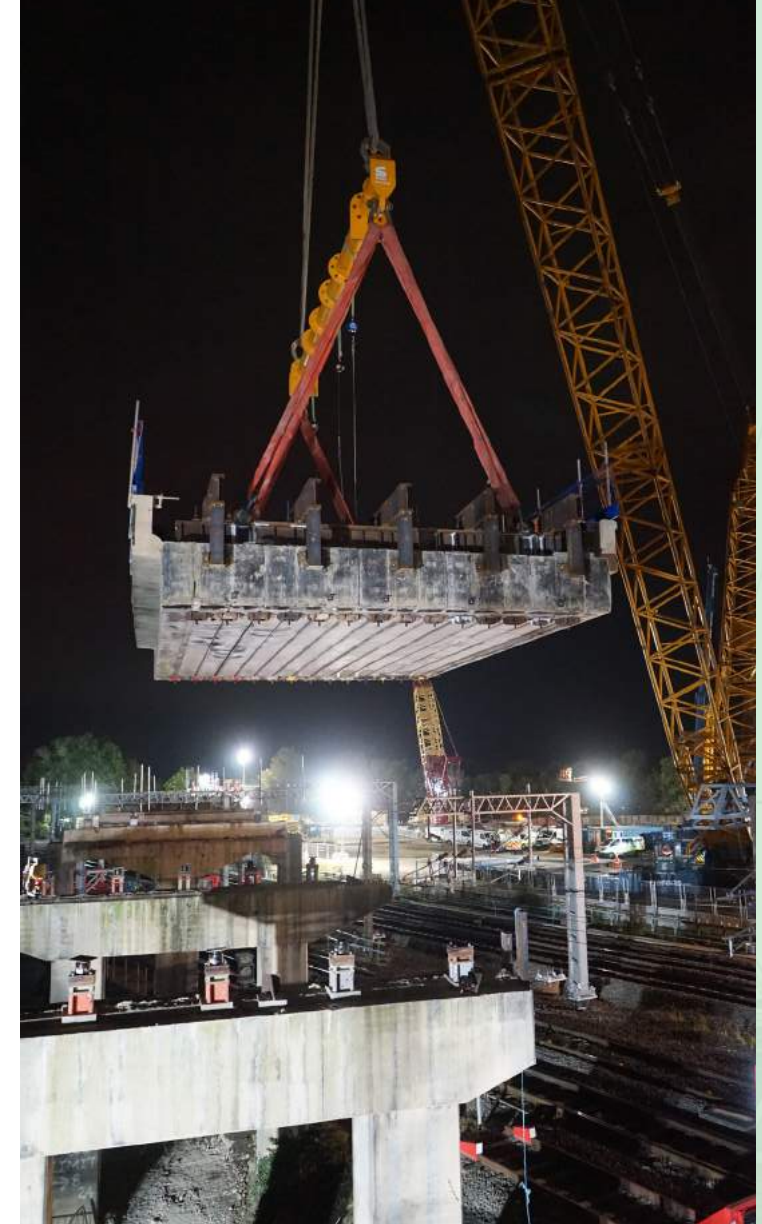
This statement sets out the steps we have taken to prevent modern slavery and human trafficking happening in our business and supply chain and outlines the measures we have and are putting in place to continue to reduce the risk of this happening in the year ahead.



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 3,300 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 5%) from Europe and North America and a fraction (less than 1%) from 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 also as a partner of the Supply Chain Sustainability School and as an active member of Build UK, where 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 acknowledge that modern slavery could possibly take place both within our own workforce and within our supply chain. To mitigate the risk of this happening within our workforce we carry out pre-employment checks, including right to work checks on all new permanent employees. We also have a preferred supplier list for the employment of our directly employed temporary workers. This list is regularly assessed and reviewed, and we have robust contracts in place with these preferred suppliers. We therefore consider that the risk of modern slavery occurring within our workforce is even lower than within our supply chain.



We risk assess our supply chain based on the type of goods or services provided, the location and how critical the supply is to our business. For example, in 2020, many of our labour agency suppliers were reassessed prior to award. This assessment included compliance with human rights; forced labour; child labour; working conditions and freedom of association. As a result of our risk assessments, we believe that there is minimal risk of modern slavery occurring in our supply chain, including amongst labour agencies.

In respect of labour providers, VolkerWessels UK has 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 are working towards achieving BES 6001 (Responsible Sourcing of Construction Products) accreditation and the international guidance standard ISO20400 for sustainable procurement. In addition, we will be further communicating with our supply chain to better understand, and address, areas of risk in their own supply chains.

DUE DILIGENCE

As set out above, we carry out pre-employment checks as part of our permanent recruitment process, and we regularly assess and review our preferred supplier list, where this is used for the recruitment of our employees.

As part of our efforts to monitor and reduce the risk of slavery occurring within our supply chains, we have adopted the following due diligence procedures:

We carry out due diligence on our supply chain, working with our accreditation partners, supplier pre-qualification systems, Constructionline and RISQS, complemented by our in-house vetting process. These assessments include modern slavery questionnaires for higher risk suppliers.

Where a non-compliance is found, through accreditation partners and in our house assessments, we work with those suppliers to become compliant, by issuing action plans and providing guidance. In addition, during the course of 2020, we conducted 15 separate audits of our high-risk suppliers.

Where we source products from outside of Europe, this is 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 e.g. branded personal protective equipment (PPE) and small tools.



POLICIES

We 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 - integrity@volkerwessels.co.uk.

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



TRAINING

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.

Through this training, employees 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 also host regular forums for our suppliers. These focus on sustainable procurement, including educating and sharing best practice around modern slavery awareness, and other responsible actions underpinned by our procurement policies. Despite the difficulties posed by the Covid pandemic, we have also hosted a number of smaller forums for our suppliers.



NEXT STEPS

INTERNAL

Continue to provide awareness training for all new starters and monitor completion of training rates.

Include awareness of modern slavery in site and office inductions.

Review training plans for supervisors and contracts managers to include modern slavery.

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.

Apply for BRE Ethical Labour Sourcing Scheme Verification to ensure that VolkerWessels UK practices are robust.

SUPPLY CHAIN

Achieve the international guidance standard ISO20400 for sustainable procurement, through collaborative practices, working as members within the Supply Chain Sustainability School.

Refresh supply chain mapping of imported PPE, tools, and equipment with our preferred UK supply chain partners, to better understand and guide.

Further auditing at premises of high-risk expenditure. Toolbox talks on site, supplier contact days and additional scrutiny of desktop audits.

Carrying out desk top reviews of modern slavery statements, provided by high-risk partners, to analyse outputs and support/share our own learning.

We are committed to introducing the Common Assessment gold standard with our supply chain, which has been agreed between Build UK and our supply chain accreditation partners, Constructionline, and the Rail Standards Safety Board.

We will look at adding additional modern slavery questions in our accreditation partners' questions, set as appropriate.

Continue the roll out of MSite employee and visitors site induction system, ensuring accurate records of everyone on our sites. Validating supply chain employee records for audits.

Work on an extensive programme to further consolidate our labour suppliers to those that can evidence the highest training and welfare practices, with due regard to UK legislation around employee rights, including minimum pay, pension provision and employee welfare.

This document has been approved by the Board of Directors of
VolkerWessels UK – June 2021.



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