

# Modern Slavery Act transparency statement

June 2022



# 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 2021.

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.





## 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 3,500 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 an even smaller percentage (less than 2%) 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 externally as a partner of the Supply Chain Sustainability School. We are also 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 directly employed employees. We also 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. 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 low.

We risk assess our supply chain based on the type of goods or services provided, their location and their relationship and annual spend with us. 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.



# Due diligence

As set out above, we have robust processes and systems to manage the recruitment and onboarding of our permanent employees, as well as our directly employed temporary workforce which reduces the risk of modern slavery occurring. These include right to work checks. We actively support the direct resourcing of employees, and regularly assess and review our preferred supplier list where these partners are engaged for the recruitment of our employees. In order to become a preferred supplier for us, that supplier must agree to comply with the Modern Slavery Act and put in place adequate measures to manage modern slavery risks.

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 use our accreditation partners supplier pre-qualification systems, through our membership of RISQS and our gold membership of Constructionline, 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.

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.





# 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.

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

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.

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.

We also run workshops with the commercial team and key operational staff to discuss a range of supply chain risks and share outputs from the due diligence process.





## Next steps

INTERNAL	Update our modern slavery e-learning module which is mandatory for all employees.	Review measures and controls in place via a Modern Slavery Working Group consisting of members of the HR, legal and procurement teams to meet quarterly to review and strategically plan improvements in our approach to modern slavery.	Implement a new and specific Anti-Slavery Policy to support our statement and consolidate our risks, responsibilities and procedures. We will publish the policy to the VolkerWessels UK group, through a modern slavery and human trafficking awareness campaign.	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 BES 6002 Environmental and Sustainable Standard Verification to ensure that VolkerWessels UK practices are robust.
SUPPLY CHAIN	Require members of our high-risk supply chain partners to undertake our modern slavery training.	Achieve BES 6001 (Responsible Sourcing of Construction Products) accreditation and the international guidance standard ISO20400 for sustainable procurement	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.	Continue to work with Constructionline to enhance our approach and look at additional ways in which they are able to support us in combatting modern slavery.	





This document has been approved by the Board of Directors of VolkerWessels UK  
– June 2022.

A handwritten signature in blue ink, appearing to read 'Alan Robertson', with a long horizontal flourish extending to the right.

Alan Robertson  
CEO - VolkerWessels UK

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