

Modern slavery statement

June 2025



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Introduction

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.

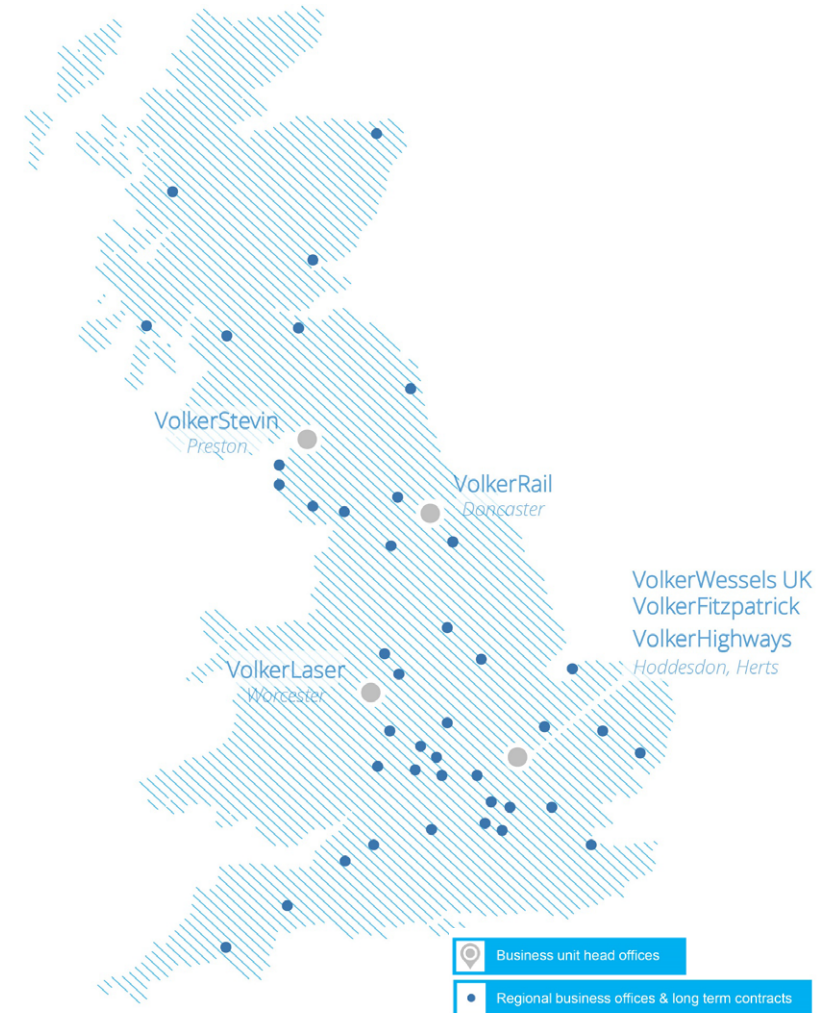
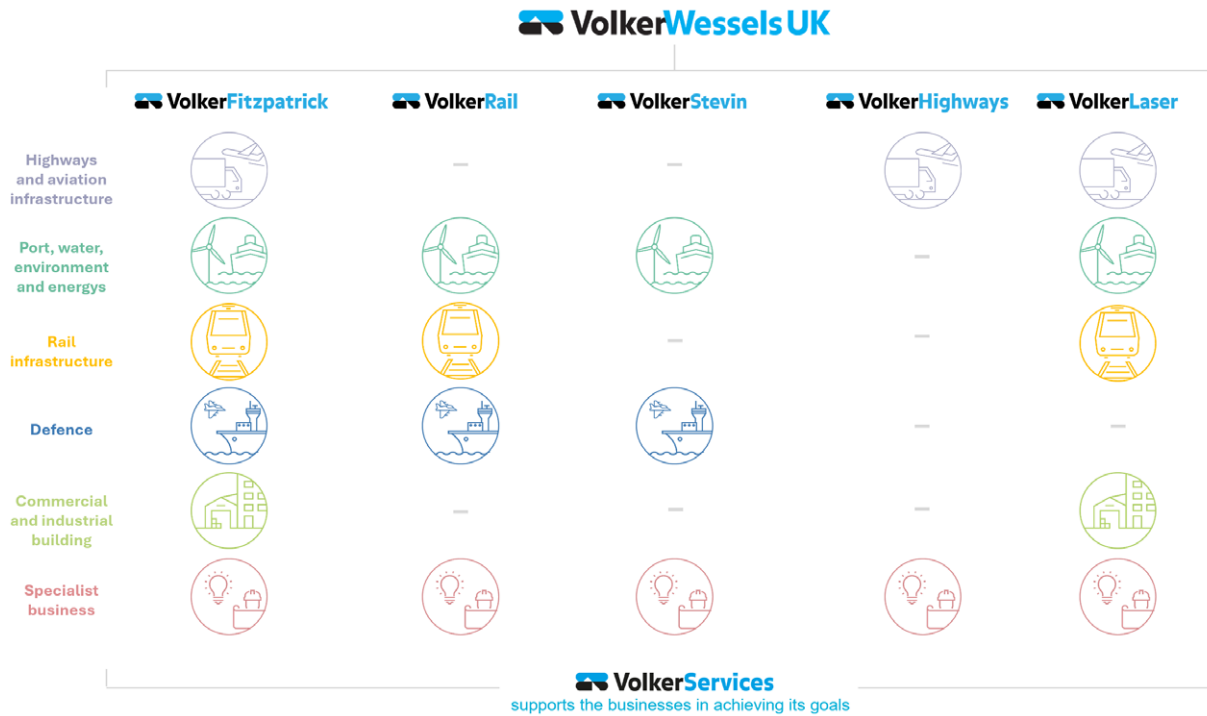
We have and will continue to publish our modern slavery statement on the UK Government's modern slavery statement registry.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement for VolkerWessels UK Limited, and all its subsidiaries ("VWUK"), for the financial year ending 31 December 2024.



Our structure

We are a leading multidisciplinary contractor delivering innovative engineering and construction solutions across the rail, highways, aviation, ports, defence, energy, water, and environment sectors. We employ around 4,000 staff and have business operations around the UK.










Our supply chain

Our supply chain is an integral part of our commitment to offering clients a quality service and we are committed to working with them to embed our high standards of ethics.

Our supply chain consists of around 4,700 suppliers. Most of our supply chain is UK based with a small amount of materials and services (less than 1%) from outside of the UK and Europe. We are committed to the highest ethical standards and we will only work with organisations that share our values and vision.

Our goods and services are sourced by our procurement and site teams dedicated to best ethical and sustainable practice. We analyse our expenditure according to risk with a dual focus on high risk and high spend categories (as noted below). We also support our SMEs, where guidance on legislative and best practice may be needed.

Group top spend category	% of Group spend
 Design and professional services	9%
 Quarry products (surfacing and aggregates)	10%
 Labour	8%
 Concrete / associated services	7%
 Earthworks / Groundworks	7%
 Plant	6%
 Mechanical, electrical and lighting	5%



Our policies

VolkerWessels UK has a suite of policies in place which address the risks relating to modern slavery and human trafficking in our business.

These policies are built into our ways of working and we expect our supply chain to adopt these policies and adhere to the same high standards as us.



MODERN SLAVERY POLICY:

Sets out the key risk areas we face and our approach to preventing modern slavery in our business. The policy highlights our business', employees' and supply chain's responsibilities, including how to spot the signs of modern slavery and our reporting procedure. This policy is reviewed annually.

INTEGRITY POLICY:

We believe that integrity is of paramount importance in the workplace; it is one of our core values. Our integrity policy gives clear direction on the high standard of behaviour we expect of our employees and representatives.

WHISTLEBLOWING POLICY:

Our employees, contractors, subcontractors and suppliers are encouraged to speak up if they see or hear anything in our workplace that they feel is inappropriate and are encouraged to report any concerns to our confidential 24/7 hotline and dedicated mailbox. Details of both are widely publicised on our site and office noticeboards. This policy is reviewed annually.

RESPONSIBLE PROCUREMENT DECLARATION:

Outlines the standards we set for our subcontractors and suppliers to ensure our business is conducted ethically, sustainably and within the laws of the country that we operate in.

FAIRNESS, INCLUSION AND RESPECT POLICY:

Sets out our commitment to an inclusive and supportive environment free from discrimination, harassment and bullying. This policy applies to all employees, consultants, contractors, agency workers and visitors to our sites and offices.

Risk and compliance

VolkerWessels UK acknowledges that the construction industry is considered a high-risk sector and regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its own business and its supply chain. We do 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, and we collaborate with other leading businesses within our sector to share best practice and provide guidance to supply chain school members on important 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 and map accordingly to the assessed risk.

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 on important issues including adherence to the Modern Slavery Act. These checks complement our in-house vetting process which includes a risk assessment across our spend categories and businesses.
- We promote full supply chain visibility and our preference for the workforce to be engaged directly where possible and practicable.
- Where appropriate, we conduct audits of our supply chain partners to check compliance.

- If 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 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.
- 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.

Modern Slavery Working Group

Our Modern Slavery Working Group meets quarterly and brings together our procurement leads, HR and Legal Directors to collaborate and discuss the risks faced by our business of modern slavery, any new developments, and review whether any further measures and controls are required.

Our purpose is to empower our people to deliver sustainable and innovative engineering and construction solutions in a safe and secure way.

Mission statement

We aim to:

- Ensure our people are at the heart of everything we do
- Build a sustainable business that is fit for the future
- Develop innovative and forward-thinking engineering and construction solutions
- Prioritise the safety and wellbeing of our teams, ensuring everyone returns home safely, every day
- Deliver excellence to construct a more secure tomorrow

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 various checks that we carry out and the robust processes and procedures that we have in place.

Internal due diligence

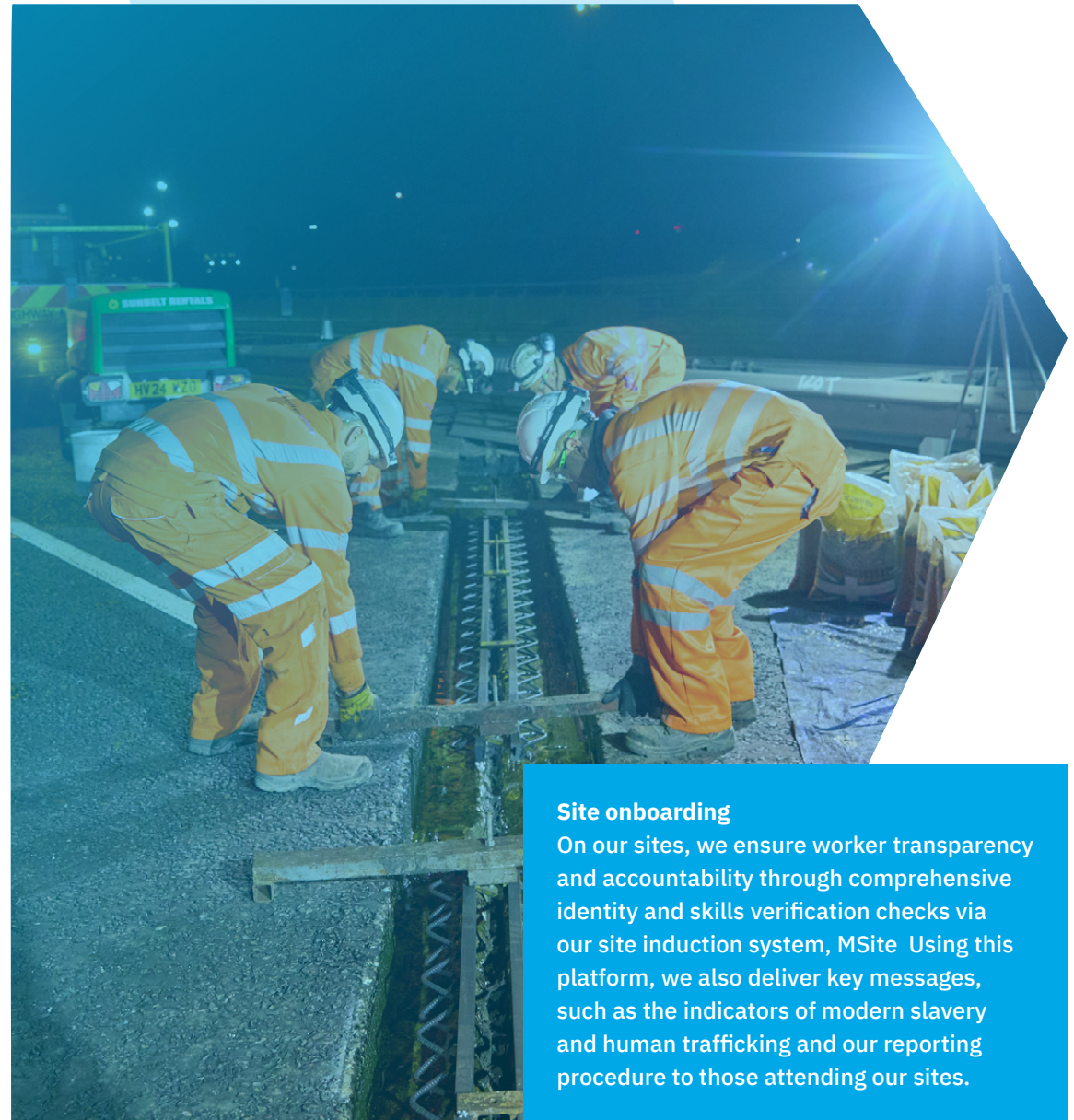
We conduct pre-employment checks for our directly employed staff including right to work checks in accordance with Government requirements. We actively support the direct resourcing of employees.

All employees are required to complete the mandatory modern slavery eLearning or toolbox talk when starting with the business.

External due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chain we have the following due diligence procedures in place:

- We use our accreditation partners supplier pre-qualification systems, through our membership of RISQS and our gold membership of Constructionline, to assess the compliance of our supply chain at the pre-qualification stage.
- We have robust contracts with 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.



Site onboarding

On our sites, we ensure worker transparency and accountability through comprehensive identity and skills verification checks via our site induction system, MSite. Using this platform, we also deliver key messages, such as the indicators of modern slavery and human trafficking and our reporting procedure to those attending our sites.

Training and awareness

Training is essential in helping to combat modern slavery. We invest in educating our colleagues 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.

The eLearning and toolbox talk helps our colleagues to understand:

- What modern slavery is
- Who can be affected
- The key signs that could indicate that an individual may be a slavery or trafficking victim
- How to report a modern slavery concern.

Through our membership of the Supply Chain Sustainability School, our employees have access to a range of resources and learning pathways in relation to modern slavery.

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 continue to raise awareness of modern slavery and human trafficking using posters both on our sites and offices and via our communications app.



In early 2024, we internally developed and implemented a refreshed modern slavery eLearning and toolbox talk for all employees to complete. As at 31 December 2024, over 90% of our staff had completed the refreshed content, which successfully met our 2024 KPI commitment.

Key performance indicators

VolkerWessels UK have set a key performance indicator to measure our effectiveness in ensuring slavery and human trafficking is not taking place in our business or supply chain.

Focus area	Objective	Indicator	Achievements
Modern slavery training	Increase awareness of our modern slavery policy across the business.	Percentage of staff who have successfully completed the modern slavery training eLearning or toolbox talk.	By the end of 31 December 2024, over 90% of our workforce had completed our refreshed modern slavery eLearning and toolbox talk.
Modern slavery policy	Ensure we have thorough and appropriate modern slavery policy and procedure in place to mitigate modern slavery in our workforce and supply chain.	Review our internal policies relating to modern slavery annually to ensure they are fit for purpose.	Our internal policies relating to modern slavery were updated in 2024 and will be updated on an annual basis.

Actions for 2025

INTERNAL

- Support Anti-Slavery day.
- The modern slavery working group will continue to meet quarterly to discuss any new developments, and review whether any further measures and controls are required in relation to combating modern slavery in our workforce and supply chain.
- 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.

SUPPLY CHAIN

- Further our modern slavery awareness programme by offering our tailored version of our modern slavery eLearning to our subcontract supply chain partners to communicate our zero-tolerance approach to modern slavery and human trafficking.
- Conduct compliance audits on our higher risk supply chain partners, with a particular focus on our labour agencies and heavy civil engineering trades.

This document has been approved by the Board of Directors of
VolkerWessels UK – June 2025.



Richard Offord
CEO - VolkerWessels UK