

A full-page photograph of a male worker in profile, facing right. He is wearing a white hard hat, safety glasses, a black long-sleeved shirt, and a high-visibility orange safety vest with reflective silver stripes. He is also wearing orange safety pants and black work boots. He is holding a mobile phone to his ear with his right hand. The background shows a port or industrial site with yellow metal barriers, a concrete ground, and stacks of colorful shipping containers (red, blue, green) in the distance under a clear blue sky. A large blue diagonal graphic element is on the left side of the page.

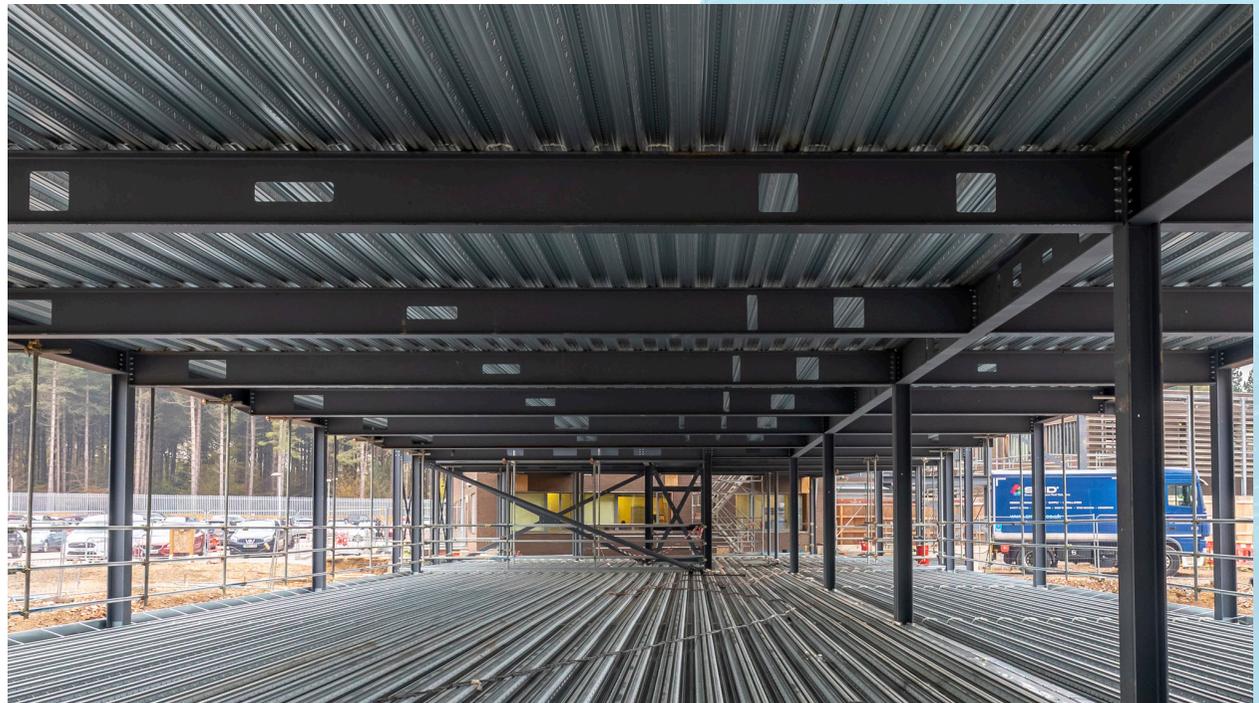
MODERN SLAVERY ACT  
COMPLIANCE STATEMENT

# INTRODUCTION

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement for VolkerWessels UK Limited, and all of its subsidiaries (“VWUK”), for the financial year ending 31 December 2019.

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 since our last statement, and outlines the measures we are putting in place to continue to reduce the risk of this happening in the year ahead.



# STRUCTURE OF THE ORGANISATION

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 employs over 3,000 staff and has business operations throughout the UK.

Our supply chain consists of around 5,200 suppliers. Most of our supply chain is UK based. However, directly and indirectly, we purchase some materials and services from Europe, North America and Asia.



# RISK AND COMPLIANCE

VWUK 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 VWUK businesses to identify any risk hotspots, and also as a partner of the Supply Chain Sustainability School, where we collaborate with other leading businesses within our sector to share best practice and provide guidance to 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 substantially 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 2019 50 high risk suppliers were sent a modern slavery questionnaire to complete, which we assessed against compliance with the following: human rights; forced labour; child labour; working conditions and freedom of association. As a result of our risk assessments, we believe that where there is a higher risk of modern slavery occurring in our supply chain is, if there is lower skilled or unskilled labour within our subcontract or if there is a long and/or complicated supply chain for materials purchased outside the EU.

As we are working towards achieving BES 6001 (Responsible Sourcing of Construction Products) accreditation and our Sustainable Procurement Standard, we are 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 staff.

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 our Constructionline assessment, we work with those suppliers to become compliant, by issuing action plans and providing guidance. In addition, during the course of 2019, we conducted 20 separate audits of our high risk suppliers.

Where we source products outside of Europe, we only purchase supplies from responsible businesses based in the United Kingdom that have robust policies and policies for auditing their own high risk suppliers.

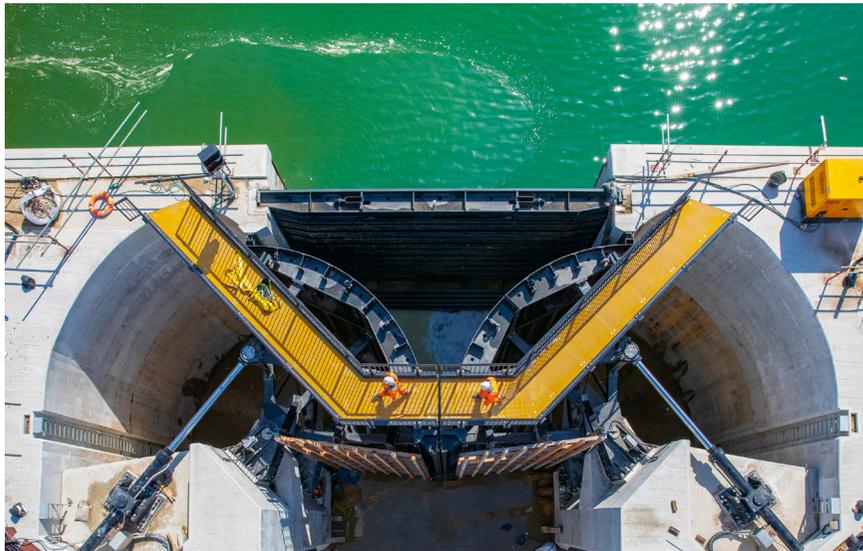
We use Supply Chain Sustainability School guidance and methodology to gain transparency and further understanding of risks when working with complicated supply chains e.g. branded personal protective equipment (PPE) and small tools.



# 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, where any concerns around any suspected malpractice can be reported.

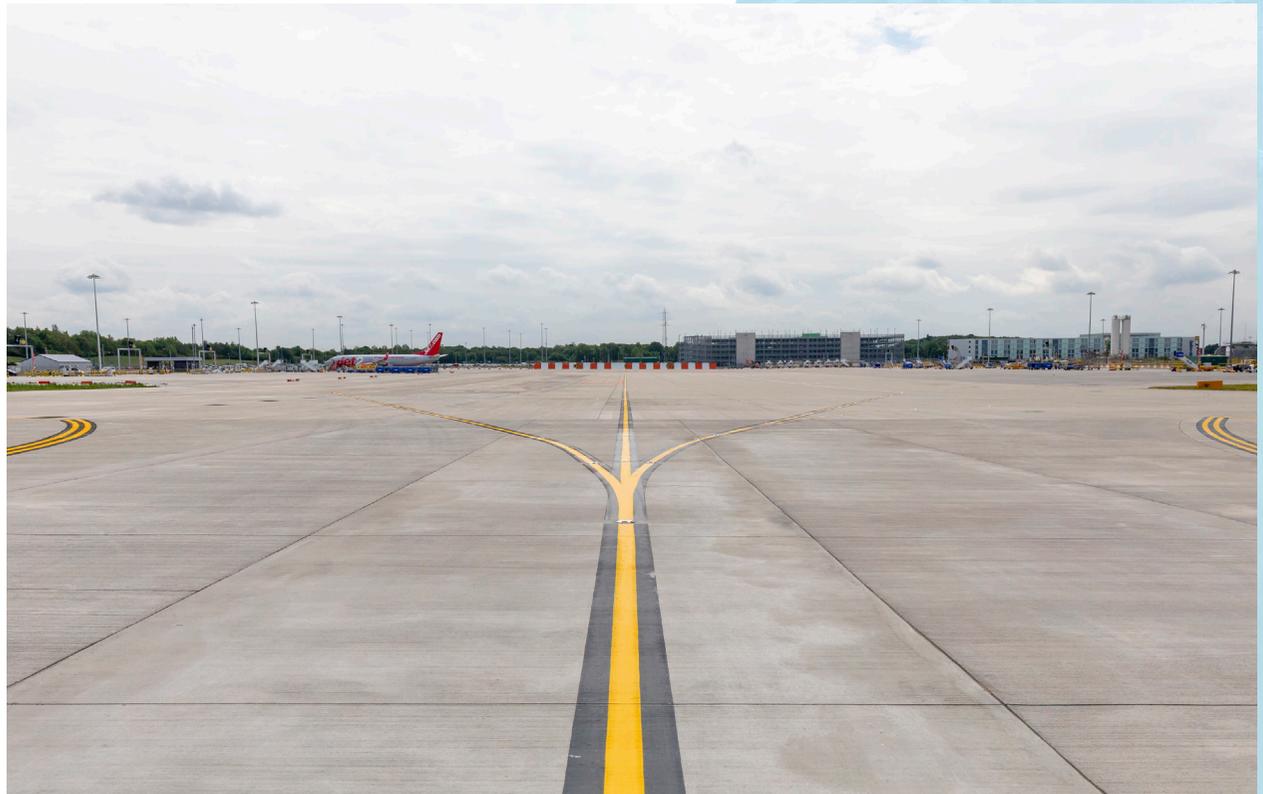
We expect our supply chain to adopt all our integrity policies and adhere to the same high standards as us. We also ask each member of our supply chain to sign up to our Supplier Code of Conduct and our Responsible Procurement Policy, which includes adherence to the ten principles of the United Nations Global Compact.



# TRAINING

We invest in educating our staff 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, that focus on sustainable procurement, and that include education on, and sharing of, best practice for modern slavery awareness and other responsible procurement policies.



# NEXT STEPS

INTERNAL

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| <p>Continue to provide awareness training for all new starters and monitor completion of training rates.</p> | <p>Include awareness of modern slavery in site and office inductions.</p> | <p>Review training plans for supervisors and contracts managers to include modern slavery.</p> | <p>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 VWUK group.</p> | <p>Apply for BRE Ethical Labour Sourcing Scheme Verification scheme to ensure that VWUK practices are robust.</p> |
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SUPPLY CHAIN

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| <p>Achieve the international guidance standard ISO20400 for sustainable procurement, through collaborative practices, working as members within the Supply Chain Sustainability School.</p> | <p>Refresh supply chain mapping of imported PPE, tools and equipment with our preferred UK supply chain partners, to better understand and guide.</p> | <p>Widen our specific modern slavery questionnaire to include all higher risk categories and suppliers.</p> <p>Further auditing of high risk expenditure. Toolbox talks, supplier days and audited spot checks on businesses.</p> | <p>Review and update the Build UK common assessment standard question set, in collaboration with our industry leading supply chain accreditation partners, Construction Line, RISQS and the Supply Chain Sustainability School.</p> | <p>Roll out of MSite employee and visitors site induction system, ensuring accurate records of everyone on our sites. Validating of supply chain employee records for audits.</p> <p>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 and pension provision.</p> |
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This statement has been delayed due to the impact of COVID-19 on the availability of key employees, who have been instrumental in preparing this document.

This document has been approved by the Board of Directors of VolkerWessels UK – August 2020.



**Alan Robertson, CEO, VolkerWessels UK**

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