

# MODERN SLAVERY ACT COMPLIANCE STATEMENT

JUNE 2019

# VolkerWessels UK 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 VolkerWessels UK (VWUK) compliance statement for the financial year ending 31 December 2018.

VWUK comprises a number of different operating business units, details of which can be found at the end of this statement.

## 1. Purpose

This statement sets out VWUK's actions to understand the potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking, forced labour or exploitation in its own business and those of its supply chain.

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.

Our supply chain consists of around 5000 suppliers. Most of our supply chain are UK based however directly and indirectly we purchase some materials and services from Europe, North America and Asia.

VWUK recognises that it has a responsibility to take a robust approach to slavery and human trafficking in support of human wellbeing and is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and associated practices.

We have several policies, robust systems and procedures in place to help ensure we operate an open, honest and ethical business. By implementing our policies and working with our suppliers, we aim to be the partner of choice for our customers and to operate ethically and responsibly.

## 2. Responsibilities under the Act

It is the responsibility of all VWUK personnel, particularly those focussed on our procurement and in operational site teams, to maintain VWUK's duties in respect of the Modern Slavery Act 2015. Directors and senior managers hold special responsibilities to hear and support those raising concerns in compliance with the Act and our related Whistleblowing policy in respect of our [integrity policies](#) and the bribery act.

## 3. Operations and high risk activities

VWUK currently operates only in the United Kingdom. The following are the processes by which VWUK assesses whether activities or countries are high risk in relation to modern slavery or human trafficking.

Since 2016 our leadership teams from across the business has been working together to train, educate and support our colleagues and our supply chain in raising awareness and tackling modern slavery.

As a partner of the Supply Chain Sustainability School we collaborate with other leading businesses within our sector to share best practices and provide guidance to school members, on issues such as modern slavery and supply chain mapping.

As we are working towards achieving BES 6001 (Responsible Sourcing of Construction Products) accreditation and our Sustainable Procurement Standard, we are communicating with our supply chain to understand and address areas of risk

# What have we done to date

	Internal	Supply Chain
<b>Risks</b>	<p>We understand our internal risks are:</p> <p>Recruitment Temporary staff and labour</p> <p>These risks are regularly reviewed.</p>	<p>We understand our highest supply chain risks are:</p> <p>Labour Logistics Contracting Purchases outside the EU Suppliers with long, complicated supply chains</p>
<b>Documentation</b>	<p><b>Business Code of Conduct</b> <i>All employees are required to accept our Integrity Suite, which defines what integrity means for our business and offers detailed guidance to help employees when they are confronted with challenging situations.</i></p> <p><b>Recruitment policy</b> <b>Whistleblowing</b></p> <p>These documents are regularly reviewed.</p>	<p><b>Supplier Code of Conduct</b> <i>Based on the United Nations Global Compact we expect all suppliers to adhere to the standards in our Responsible Procurement Policy.</i></p> <p><b>Contractual agreements</b> <i>Including reference to modern slavery policies.</i></p> <p><b>Audit questionnaires</b></p> <p>These documents are regularly reviewed.</p>
<b>Due diligence</b>	<p><b>Preferred supplier list</b> <i>In place for all permanent and temporary recruitment to ensure that workers have the right to work in the UK and that worker's own rights such as holiday pay, sick pay and appropriate salary are fulfilled.</i></p> <p><b>Payment processes</b> <i>Checks in place on duplicate bank accounts to ensure no suspect activity.</i></p> <p><b>Whistleblowing Line</b> <i>We are committed to an open culture where employees feel secure in seeking advice or raising concerns and have confidence that reports are handled in a professional and transparent way. To help enable this culture, we have established a 'whistleblowing' Line, a secure incident reporting system administered by a VWUK board Director through which employees can report their concerns about any potential breach of our Business Code of Conduct.</i></p> <p><b>Human Rights risk assessment</b> <i>Cross-functional group with key responsibilities to assess present and potential human rights impacts within the business and supply chain, putting in place actions where necessary.</i></p>	<p><b>Supply chain risk assessment</b> <i>We risk assess our supply chain based on the types of goods or services provided, location and supply criticality. We do this by working with our partners Supplier pre-qualification systems Constructionline and RISQS complemented by our inhouse vetting processes.</i></p> <p><i>In 2018, 30 high risk suppliers were sent a modern slavery questionnaire to complete which have been assessed on compliance to the following; human rights, forced labour, child labour, working conditions and freedom of association.</i></p> <p><i>For products sourced outside Europe we only work with responsible businesses that have robust policies and auditing programmes of their own high risk suppliers.</i></p> <p><i>During the course of 2018, VWUK conducted 15 audits of high risk suppliers.</i></p> <p><b>Supply chain mapping</b> <i>We use the supply chain sustainability school guidance and methodology to gain transparency and further understanding of risks on complicated supply chains, eg branded personal protective equipment (PPE), and small tools.</i></p>
<b>Development, education and awareness</b>	<p><b>E-learning training modules</b> <i>All members of staff and managers must undertake a modern slavery E learning module, which is part of our integrity suite.</i></p> <p><i>In the last year 2,500 colleagues have taken this first step to understand their responsibilities, along with recruiting, procurement and commercial managers.</i></p> <p><b>Awareness campaign</b> <i>We have encouraged and engaged staff to use Supply Chain Sustainability School resources and events, internal articles and bulletin posts, posters and videos.</i></p>	<p><b>Action plans</b> <i>Where non-compliances are found through our Constructionline assessment we work with those suppliers to become compliant by issuing action plans and providing guidance</i></p> <p><b>Awareness campaign</b> <i>Encouragement to our supply chain to become members of the Supply Chain Sustainability School through discussions in our pre let meetings and posters around sites</i></p> <p><b>Supplier days</b> <i>We host regular forums that include focus on education and sharing of best practice for our Modern Slavery, Drug &amp; Alcohol and responsible procurement policies</i></p>

Our policies, procedures, Business Code of Conduct and our Supplier Code of Conduct define our standards and expectations.

If employees suspect that human trafficking, slavery, servitude or forced or compulsory labour may be taking place anywhere in our business or supply chain they are encouraged to let their line manager know and report immediately via the VWUK Whistleblower hot line, or by discussion with their line manager or a business senior manager.

To request a copy of our policies, please contact us [here](#).

## Targets and next steps

	Internal	Supply Chain
2019 targets	<p>Ensure we provide awareness training to those that have missed in the earlier roll out.</p> <p>Include awareness of Modern Slavery in site and business inductions, including newly formed and acquired businesses.</p> <p>Review training plans for supervisors and contracts managers to include modern slavery.</p> <p>Prevention of illegal working guidance will be created and rolled out to the business.</p>	<p>Working towards certification to ethical Labour Sourcing Standard BES 6002.</p> <p>Refreshing 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 50 high risk categories/suppliers.</p>
Next steps	<p>Continue with awareness campaign, using posters, magazine articles, e-learning and toolbox talks to further embed modern slavery within the VWUK group.</p>	<p>Continue due diligence and development programmes using Construction Line risks, Supply Chain Sustainability School, auditing of high risk expenditure, toolbox talks, supplier days and spot checks.</p>

By implementing our policies and working together with our suppliers we aim to demonstrate that we operate our business ethically, responsibly and sustainably.

The statement is made on behalf of VolkerWessels UK and its subsidiaries:

- VolkerFitzpatrick Limited
- VolkerStevin Limited
- VBA Jointventure Limited
- VolkerServices Limited
- VolkerWessels Limited
- VolkerLaser Limited
- VolkerRail Limited
- VolkerRail Specialist Business Limited
- VolkerHighways Limited
- VolkerWessels UK Limited
- VolkerRail Group Limited
- VolkerStevin Group Limited

This statement has been approved by the Board of Directors of VolkerWessels UK - June 2019.



Alan Robertson  
CEO VolkerWessels UK

Copies of previous years' Modern Slavery Statements can be found by [clicking here](#).

