

Modern slavery and human trafficking transparency statement

June 2024



CONTENTS

Introduction	3
Our structure and supply chain	4
Risk and compliance	5
Due diligence	6
Policies	7
Training	8
Key performance indicators	9
Next steps	10

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 its subsidiaries (“VWUK”), for the financial year ending 31 December 2023.

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.

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



Our structure and supply chain

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 core values define our organisation's ethics and guide our decisions, actions and behaviours, which results in best-in-class delivery, quality and people. All our companies share the same philosophy and core values.

Our supply chain consists of around 5,000 suppliers. Most of our supply chain is UK based with a small amount of materials and services (less than 1%) from Europe and Asia.



Highways and aviation infrastructure



Rail infrastructure



Commercial and industrial building



Ports, water, environment and energy



Defence



Specialist business

VolkerWessels UK



VolkerFitzpatrick



VolkerRail



VolkerStevin



VolkerHighways



VolkerLaser



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 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.

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 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 remind our top 200 supply chain partners of our VWUK group policies including our modern slavery policy, by requesting they sign up and agree to the policies annually.
- We promote full supply chain visibility and our preference for the workforce to be engaged directly where possible and practicable.

- Where appropriate, we instruct external parties to 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, 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.
- 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.



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. These include 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.

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 conduct validation checks on our supply chain.
- 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.



Policies

In 2023, we introduced a Modern Slavery Policy to further embed our zero tolerance approach to slavery and human trafficking and underline our commitment to eradicating modern slavery in our operations and supply chains. We also have a number of policies, procedures and controls in place to help ensure we operate an open, honest, responsible, and ethical business. These 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 suite of policies and adhere to the same high standards as us. We also ask each member of our supply chain to adhere to 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 and toolbox talks.

Employees are also 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.

As at 31 December 2023, over 95% of our staff had completed our modern slavery eLearning which informs them of what modern slavery is, the key signs of modern slavery and our reporting mechanisms.



Key performance indicators

VolkerWessels UK have set key performance indicators to measure our effectiveness in ensuring slavery and human trafficking is not taking place in our business or supply chain. They include the following:

Focus area	Objective	Indicator	Achievements
Modern slavery policies and procedures	Ensure we have a thorough and appropriate modern slavery policy and procedure in place to mitigate modern slavery in our workforce and supply chain.	Review our modern slavery policy and procedure annually to ensure it is fit for purpose.	We introduced our modern slavery policy in FY23 and the policy will be reviewed annually.
Modern slavery and human trafficking training	Requirement for over 90% of employees to successfully complete the refreshed mandatory modern slavery and human trafficking training as at 31 December 2024.	Number of successfully completed modern slavery and human trafficking training modules.	As at 31 December 2023, over 95% of our employees had completed the modern slavery training.



Next steps

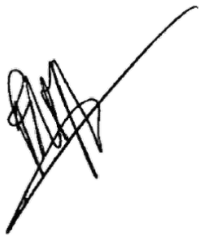
INTERNAL

- Working in partnership with MSite to introduce and facilitate the translation of our site induction content, which includes our modern slavery poster, into 20 different languages.
- 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.
- Introduce our refreshed, mandatory, modern slavery eLearning and toolbox talk for employees to complete in FY24.
- 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

- Consider extending the annual reminder of our VWUK group policies, including the modern slavery policy, from our top 200 supply chain partners to our top 300.
- Assess our key labour suppliers on the policies and procedures they have in place to mitigate modern slavery and human trafficking in their work force.
- Offer a tailored version of our modern slavery eLearning to our significant supply chain partners prior to commencing on site to communicate our zero-tolerance approach to modern slavery and human trafficking.

This document has been approved by the Board of Directors of
VolkerWessels UK – June 2024.

A handwritten signature in black ink, appearing to be 'Richard Offord', written over a horizontal line.

Richard Offord
CEO - VolkerWessels UK