

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 2017.

VWUK comprises the following operating business units: VolkerFitzpatrick, VolkerRail, VolkerStevin, VolkerHighways and VolkerLaser.

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.

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.

2. Responsibilities under the Act

It is the responsibility of all VWUK personnel, particularly those focussed on our procurement and 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 [whistle blowing policy in respect of our integrity policies](#) and the bribery act.

3. Operations and high risk activities

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

We carry out supplier assessment for services and goods in accordance with our responsible procurement policy through pre-contract checks, including those for prequalification and tendering, using a range of evaluation criteria including risk assessment of slavery or human trafficking. Regular audits may be undertaken for suppliers or sub-contractors considered high risk.

We have identified that higher risk activities may include supply chain contingent labour often supplied via labour agencies or gangmasters and the provision of consumables and materials from EU and non-EU sources, including countries with emerging economies or suppliers with extended supply chains.

Primary mitigation for these risks includes:

- Working with our supplier prequalification partners (Constructionline and Achilles RISQS), complimented by in-house vetting procedures
- Close site supervision of supply chain workforce, particularly those from labour agencies
- Training with regular updates for managers and appropriate key personnel to recognise and act upon any concerns regarding the possibility of modern slavery and human trafficking in the business

4. Reporting

VWUK has internal reports on all measures pertaining to supply chain assessment, vetting and review. Where a member of staff or our supply chain has concerns on issues of forced labour, exploitation, hiring practices or human rights they should contact their line manager or the VWUK executive compliance officer using the confidential whistle blowing telephone line– 01992 305 118. We are committed to reporting incidents to the relevant authority where concerns are identified and proven.

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

5. Due diligence

VWUK undertakes due diligence when considering new suppliers, and through regular reviews with its existing supply chain. Such due diligence includes:

- Mapping the activities of VWUK and those of our supply chain broadly to assess particular product or geographical risks associated with modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier including seeking an annual statement of compliance from our important supply chain and in addition an audit for the highest risk service providers
- Creating risk profiles for higher risk suppliers and services through expenditure reports
- Developing improvement plans with any suppliers that have no apparent awareness or policy, and subsequently taking a strong stance with suppliers or sub-contractors paying little attention to modern slavery and human trafficking including, as necessary, termination of a business relationship

6. Compliance actions taken in the 2017 financial year

- In the last year, VWUK have introduced a 15-minute e-learning module for all staff with computer access. Site based, non-computer colleagues have all undertaken a toolbox talk on-site covering all aspects of the learning.
- All relevant supply chain documentation, including pre-award and contracts documents were updated to incorporate statements referring to the modern slavery act and its requirements.

- Similarly, our supply chain accreditation partners, Constructionline and Achilles have updated their respective question sets to request that authorised signatories accept the new legislation.

7. Compliance actions planned for the 2018 financial year

- VWUK are aiming for all staff to complete the e-learning module or toolbox talk, targeting 100% staff awareness during the course of 2018.
- VWUK will ensure that all new staff members joining the business undertake the training – either via e-learning module or toolbox talk as part of their induction to the business.
- Thirty of our supply chain partners providing labour have been sent specific questionnaires to complete. In general, VWUK are satisfied with the responses to date, although we are ever vigilant on site. VWUK will carry out physical audits on a number of our largest labour providers during the year.
- VWUK will also be publishing reminders to be vigilant on InSite, the VWUK intranet, which is available to most employees and will extend to a poster campaign onsite as well.

This statement has been approved by VolkerWessels UK and signed by a designated officer.

Copy of 2016 Modern Slavery statement can be found [by clicking here.](#)

Graham Davey
Group Procurement Director

Dated: 29 June 2018