

Modern Slavery Policy

November 2025

VolkerWessels UK Modern Slavery Policy

Issue 3, November 2025

1. PURPOSE

VolkerWessels UK (VW 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.

At VW UK, there is a zero tolerance to slavery and human trafficking, and we uphold all laws relevant to countering slavery and human trafficking in all jurisdictions in which we operate.

This policy sets out the key risk areas we face and our approach to avoiding and preventing modern slavery. It also details the role we expect our employees to play in helping VW UK combat modern slavery and human trafficking in our own operations and in our supply chain.

2. SCOPE

This policy is issued by all companies within the VW UK group of companies and applies to employees of all VW UK companies. 'Employee' in this context means directly employed, agency workers, contractors, and temporary employees.

This policy applies to all work, contracts and business-related dealings of any nature whether undertaken in the UK or outside the UK.

This policy has the full support of the directors of VW UK and all its subsidiary companies. If you have any questions on this policy, please contact the VW UK Compliance Officer.

3. ABBREVIATIONS & DEFINITION OF TERMS

HR - Human Resources

MSA - The Modern Slavery Act 2015

RISQS - Railway Industry Supplier Qualification Scheme

VW UK - VolkerWessels UK

4. POLICY**4.1 The Legal Position on Modern Slavery and Human Trafficking**

The Modern Slavery Act 2015 (MSA) covers four activities:

Slavery	Exercising powers of ownership over a person.
Servitude	The obligation to provide services is imposed by the use of coercion.
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation.

This policy covers all four activities.

Under the MSA, a person commits an offence if:

- i. The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- ii. The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

Section 54 of the MSA provides that a commercial organisation, such as ours, must prepare a slavery and human trafficking statement for each financial year of the organisation (See Section 4.8 Modern Slavery Statement).

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4. POLICY (CONTINUED)**4.2 Our Position on Modern Slavery and Human Trafficking**

VW UK has a zero-tolerance approach to slavery and human trafficking and is committed to doing what it can to eradicate modern slavery and ensure it does not exist in our operations and supply chains. However, it is a complex and multi-faceted crime and tackling it requires all of us to play a part.

4.3 Responsibilities

VW UK, and all employees have responsibilities to ensure that our fellow workers are safeguarded, treated fairly and with dignity.

4.4 Organisation Responsibilities

We will:

- Maintain clear policies and procedures aimed at preventing exploitation and human trafficking, and protecting our workforce and reputation
- Be clear about our recruitment policy (See Section 4.8 Temporary and Permanent Recruitment)
- Check our supply chains (See Section 4.8 Supply Chains)
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- Ensure we have in place an open and transparent grievance process for all staff
- Seek to raise awareness so that our colleagues and our supply chain know what we are doing to promote their welfare
- Make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees and our clients seriously (See Section 4.8 Modern Slavery Statement)

4.5 Manager Responsibilities

Managers must:

- Be approachable and listen to colleagues
- Respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation by informing VW UK 's Compliance Officer
- Remain alert to indicators of slavery (See Section 4.9 Identifying Slavery)
- Raise the awareness of our colleagues, by discussing issues, so that everyone can spot the signs of trafficking and exploitation and know what to do

4.6 Colleagues

All employees have responsibilities under this policy. Whatever your role or level of seniority, you must:

- Keep your eyes and ears open - if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (See Section 4.10 Reporting Slavery)
- Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- Tell us if you think there is more we can do to prevent people from being exploited

4.7 The Risks

The principal areas of risk we face, related to slavery and human trafficking, include:

- Supply chains
- Recruitment through agencies
- General recruitment

We manage these risk areas through our procedures including those set out in this policy.

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4. POLICY (CONTINUED)**4.8 Our procedures****Modern Slavery Statement**

To comply with Section 54 of the MSA, we make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

We make this statement on our website and add it to the government's online modern slavery statement registry as required.

Supply Chains

We thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced. Some of the ways we do this is by:

- Including an anti-slavery clause in all of our supplier contracts. This clause prohibits suppliers and their employees from engaging in slavery or human trafficking
- Working predominately with supply chain partners accredited by the Common Assessment Standard, which ensures that suppliers are compliant with 13 areas of risk management, including modern slavery
- Conducting annual risk assessments through Constructionline and RISQS
- Conducting risk assessments on a project-by-project basis and prior to award. Where appropriate, the senior management of our supply chain partners are requested to demonstrate their corporate social responsibility and modern slavery compliance

If we are alerted to a modern slavery and human trafficking non-compliance within our supply chain, the VW UK Compliance Officer must be informed. Each non-compliance issue will be reviewed on a case-by-case basis and an action plan implemented as appropriate.

Temporary Recruitment**Using Agencies**

- Our procurement teams follow company policy and use agreed specified reputable recruitment agencies.
- To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This may include:
 - Conducting background checks
 - Investigating reputation
 - Due diligence checks around an agency's financial standing, as well as their policies, procedures and affiliation to appropriate trade or industry bodies
 - Ensuring the staff an agency provides have the appropriate paperwork (e.g. work visas)
 - Ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying
 - Carrying out an in-depth audit at premises or as appropriate, with agency employees on site. If approved for use, agencies are mandated to sign up to framework agreements that stipulate the various statutory obligations and service levels they must abide by
- Approved agencies are monitored on an ongoing basis regarding compliance, as part of normal supplier assurance tracking activities

Permanent Recruitment

- We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work
- We always ensure staff are legally able to work in the UK by conducting Right to Work Checks
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to
- All employees on induction to the business are required to complete mandatory modern slavery training

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4. POLICY (CONTINUED)**4.8 Our Procedures (Continued)**

If, through our recruitment process, we suspect someone is being exploited, the recruitment team, HR department or hiring manager as appropriate will follow our reporting procedures (See Section 4.10 Reporting Slavery).

4.9 Identifying Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. The following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification, or travel documents
- The person is acting as though they are being instructed or coached by someone else
- They allow others to speak for them when spoken to directly
- They are dropped off at and collected from work
- The person is withdrawn, or they appear frightened
- The person does not seem to be able to contact friends or family freely
- The person has limited social interaction or contact with people outside their immediate environment

This list is not exhaustive.

A person may display several of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it.

4.10 Reporting Slavery

If you are concerned that an individual may be being exploited or abused and is in immediate danger, then please dial 999.

Not all victims want to be helped and there may be instances where reporting a suspected trafficking case may put the potential victim at risk so it is important that in the absence of immediate danger, you report your concerns first to the VW UK Compliance Officer directly (jennyscott-russell@volkerwessels.co.uk) or via our whistleblowing hotline (01992305118) or dedicated mailbox for integrity matters (integrity@volkerwessels.co.uk).

4.11 Training and Communications

We will communicate this policy to employees across VW UK through our established internal communications channels. All employees of VW UK are also expected to successfully complete the mandatory training on modern slavery, part of our integrity suite of training.

We will also communicate this policy to our suppliers, contractors and business partners.

4.12 Associated Policies

- *VolkerWessels UK Integrity Policy*
- *VolkerWessels UK Whistleblowing Policy*

4.13 Monitoring our Procedures

The VW UK Compliance Officer will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

5. IMS AUTHORISATION**Document owner approval:**

Jenny Scott-Russell, Legal Director - 11.11.2025

Approval for IMS:

Yvonne Nyoni, IMS Administrator - 11.11.2025

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