

It is the policy of WRW to ensure, so far as is reasonably practicable, to ensure that it will not support or deal with any business knowingly involved in slavery or human trafficking and it will take steps to ensure that its Statutory Duties are met at all times.

WRW acknowledges its obligations and responsibilities under section 54(1) of the Modern Slavery Act 2015 and its activities are controlled, implemented and continuously improved via its Integrated Management System "IMS".

As a construction business operating within the UK, the areas of our operation that could be affected by slavery and human trafficking are our employees, agency workers working on our behalf, subcontractor operatives working on our sites, and the workforce of our suppliers.

## Employees

- We verify that all employees have the right to work in the UK upon commencement of their employment.
- We make all employees aware of their working hours, leave and absence entitlements and other employment benefits via the Employee Handbook.
- We prohibit the use of forced labour in our Code of Conduct and training on modern slavery is available to employees.

## Agency workers

- We aim to only engage agency workers that are provided by Approved Suppliers.
- We require all Approved Supplier List suppliers to a) ensure their agency workers have the right to work in the UK b) confirm that they do not charge workers a work finding fee and c) to have
- procedures in place to minimise the risk of recruiting forced or compulsory labour.

## Subcontractors

- We require subcontractors to ensure their employees have the right to work in the UK.
- We consider sub-contractors' approaches to employee rights and any breaches of human rights related legislation during our selection process.
- We ask all site operatives to provide evidence of their CSCS cards.
- We want all sub-contractors that purchase materials for use on our sites to consider the risk of
- modern slavery in their supply chain.

## Suppliers

- We procure the majority of our directly sourced materials from UK based organisations that are required to comply with UK laws on forced labour. Where materials are directly sourced from outside of the UK we consider the risk of slavery and human trafficking as part of our selection process.

It is the policy of WRW to actively engage with the supply chain to build effective relationships to ensure transparency and make clear its expectations on business behaviour. In doing so, WRW make clear its commitment to ensure, as far as reasonably practical, that slavery and human trafficking is not taking place anywhere in the company or the supply chain.

WRW's Directors shall take responsibility of this policy. An annual review of the policy will be undertaken as well as an annual audit of the procurement process to ensure that system is effective.

This Policy Statement is to be read in conjunction with WRW's other Policy Statements which are displayed in its offices and construction site premises to promote the expectations of WRW Construction.

Signed:



Robert Williams – Group Chairman

Dated: 7<sup>th</sup> March 2017