



Modern Slavery and Human Trafficking Policy

Background

This policy statement forms part of a suite of policies which guide various aspect of our business activities as follows;

- Anti-bribery, ethics and corruption policy
- Equal opportunities policy
- Whistle-blowing policy
- Grievance policy
- Health and safety policy
- Bullying and harassment policy

Modern slavery and human trafficking are violations of fundamental human rights. They may take various forms, including slavery, bonded and forced labour, sex trafficking, child labour and domestic servitude. These criminal activities all deprive people of liberty in order to exploit them for personal or commercial gain.

WJ supports the belief that human rights are universal and are committed to the ethical principles of human rights in our operations. We support the United Nations Universal Declaration on Human Rights and work hard to ensure that in all areas of interaction with our employees, clients, suppliers, third parties and interviewees, individuals are protected and treated fairly ensuring our compliance with both the wording and spirit of the Human Rights Act 1998 and the Modern Slavery Act 2015. We require all employees to comply with the employment legislation and supply chain management legislation in the countries within which we operate.

The Structure of the Organisation

WJ has been established in the UK as a limited liability company since 1983. WJ Management Limited was incorporated in the UK on 14th July 1997 and is now the ultimate parent company. Subsidiary branch offices and trading companies have since been established in various countries including Ireland, Poland, Turkey, United Arab Emirates, Qatar, Hong Kong, Australia and Canada (collectively referred to in this document as WJ).

WJ offers a complete groundwater control and management service, which encompasses design, installation and maintenance programmes to clients and contractors throughout the UK and overseas. WJ works across several industry sectors and specialises in providing the following services:

- Dewatering and groundwater control for construction projects;
- Drilling and probing for tunnelling;
- Well drilling and pump testing services;
- Geotechnical monitoring;
- Remediation and treatment of contaminated ground; and
- Ground source energy systems for building heating and cooling.

WJ employs approximately 300 staff principally located in the UK, Poland, the Middle East and Canada.



Our Policy

WJ complies with all applicable local and UK laws and regulations, including the Human Rights Act 1998 and Modern Slavery Act 2015. WJ are committed to ensuring transparency in our business, in our approach to modern slavery and to implementing and enforcing systems and controls designed to ensure modern slavery is not taking place in our business or in our supply chains.

We are committed to the following core values in connection with our people;

- we value diversity and respect for the individual;
- we believe in teamwork for the good of the business and our clients;
- we are committed to developing and training all our staff;
- we are committed to rewarding achievement fairly

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chain we provide support, advice and training during our induction for all staff. In addition we ensure that;

- pay and benefits are at least in line with industry benchmarks or national minimums
- we conduct annual audits on our overseas offices
- we protect whistle blowers
- we raise employee awareness of the risks of modern slavery and human trafficking in our supply chains and our business

All our employees have a written contract of employment, and their right to work in the relevant jurisdiction is established prior to their employment commencing. All employees are made aware of their statutory rights and benefits during their induction process.

WJ is committed to the protection of young workers including the prevention of child labour and forced, bonded or involuntary labour throughout our business and supply chain. This commitment is underpinned by the following:

- WJ is committed to not recruiting or hiring workers below the age of 15 or in compliance with the local minimum age (whichever is higher). WJ's suppliers must accept the principles of remedial action and support for child and under age workers, and where such labour is discovered suppliers must establish and implement appropriate support measures for such workers and introduce effective systems to prevent the use of child labour in the future.
- WJ is committed to complying with all applicable legal and customer requirements.
- WJ is committed to not allowing young workers (below the age of 18) to work overtime, at night, or in hazardous jobs.
- WJ will not source equipment or materials from any Supplier which uses any form of forced, bonded or involuntary labour.

This policy applies to all persons who act on WJs behalf in any capacity, including employees at all levels, directors, consultants, contractors, agency workers, volunteers, interns, business partners and our supply chains.



Our Supply Chain

WJ has a zero tolerance to all forms of exploitation, whether it is enslavement, people trafficking, racial intolerance, gender inequality etc. To ensure our supply chain complies with our values, we implement regular supply chain reviews. We expect our business partners, subcontractors and suppliers to:

- Ensure employees have the freedom to choose to work for them and to end that employment after a mutually agreed notice period.
- Ensure employment is not forced, bonded or non-voluntary prison labour.
- Demonstrate a commitment to equality of opportunity for all individuals free from discrimination and oppression.
- Ensure no harsh, cruel or degrading practices are allowed.
- Offer working hours that are not excessive and are compliant with relevant national laws or industry standards.
- Have appropriate disciplinary, grievance and appeal procedures in place.
- Ensure health and safety measures are in place to protect the workforce and the wider public.
- Offer wages and benefits at least in line with industry benchmarks or relevant national minimums.
- Have a confidential whistle-blowing process in place where all reported instances are investigated thoroughly.

WJ will not support or deal with any business which is known to be involved in slavery or human trafficking.

Due Diligence Processes

WJ procures the majority of its materials from European based organisations that are required to comply with European laws on forced labour, however where materials are directly sourced from outside of the Europe we consider the risks of slavery and human trafficking as part of our supplier selection process.

WJ also have in place the following systems to mitigate risk:

- Comply with Ethical Trading initiative
- Monitor potential risk areas in our supply chains
- Identify and assess potential risk areas in our supply chains
- Mitigate risk of slavery and human trafficking occurring in our supply chains
- Protect whistle-blowers

Compliance

- All staff must read, understand and comply with this policy.
- All staff must avoid any breaches of this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. Staff must avoid any activity that breaches this policy.
- All staff must report to their manager at the earliest opportunity, if they suspect or believe there has been a breach of this policy, or that a breach may occur in the future.
- Staff are reminded that there are systems in place to encourage the reporting of concerns



and to protect whistle blowers.

- Individual Directors and locally based Country Managers are responsible for compliance with this policy.
- Ultimate responsibility for compliance and review of this policy lies with the Board of WJ Management.

Breach of Policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We will terminate relationships with suppliers, individuals or business partners working on our behalf if this policy is breached.

Handwritten signature of Richard Fielden in blue ink.

Richard Fielden
Managing Director

Handwritten signature of Toby Roberts in blue ink.

Toby Roberts
Executive Chairman

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