

# WPI Group Holdings Limited Modern Slavery Act Statement

## Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that WPI Group Holdings Limited (“WPI”/ “the Company”/ “us”/ “we”/ “our”) has undertaken and is continuing to take to ensure that modern slavery is not taking place within the Company or our supply chains.

We are opposed to any form of exploitation including human trafficking and modern slavery and we recognise that we have a responsibility to take a robust approach to preventing it in our activities and that of our supply chains, as detailed in this Statement.

### A. Our Business

Established in 1979, the Company specialises in Civil Engineering, Surfacing, Construction and Remediation. Over the years we have forged long-term relationships with a wide range of major housebuilding and other construction industry clients and now employ over 350 highly skilled staff, together with an extensive fleet of vehicles and machinery to ensure that we have the capability to meet all of our current and future clients’ needs. We are immensely proud of the business we’ve built and the fact that we are now recognised as one of the largest and most successful engineering companies operating in the North West of England.

### B. Structure & Supply Chains

The supply chain that supports our business comprises of a wide range of suppliers and encompasses products and services including suppliers of building products and materials, consultancy services, IT hardware and software, subcontractors providing labour, recruitment agencies providing contingent agency workers and permanent recruitment services.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

### C. Due Diligence Processes & Risk Assessment

As a construction business operating in the UK, the key areas of our business that we believe could be affected by modern slavery are; directly hired employees, labour provided by our subcontractors, contingent supplied agency workers on our sites and the workforce of our supply chain who supply materials to our business.

The steps we have taken to mitigate risks in relation to each of these are as follows:-

- **Directly Hired Employees**

We verify that all directly hired employees have the right to work in the UK before they start work with us and we make all employees aware of their working hours, working time regulations, holiday and leave entitlements and all other entitlements via the Employee Handbook.

- **Contingent Supplied Agency Workers**

We only procure agency workers from our approved preferred suppliers list. As part of our agency workers becoming an approved supplier to the company, we require those suppliers to ensure their agency workers have the right to work in the UK and that they produce a written statement on their approach to preventing modern slavery and human trafficking.

- **Subcontractors**

When placing subcontractor orders for use on our sites, our formal subcontract reminds our subcontractors of WPI Group's commitment to modern slavery and human trafficking.

- **Suppliers**

We procure the majority of our sourced goods, services, products and materials from UK-based organisations. Where possible we will procure from suppliers that are required to comply with UK laws on modern slavery. We want all of our suppliers to consider the risks of modern slavery in their supply chain.

The above due diligence processes are aimed to:

- Identify potential risk areas within our business and supply chain;
- Reduce the risk of modern slavery and other forms of servitude from occurring;
- Monitor potential risk areas in our business and supply chain.

#### **D. Our Policies**

The following policies are reviewed and updated regularly to describe our approach to modern slavery:-

- **Employee Handbook** - Includes among other things, policies on diversity, health and safety, grievance procedures and whistleblowing. Our Whistleblowing Policy in particular ensures that all employees know that they can raise concerns without fear of reprisals
- **Whistleblowing Policy** – Updated to allow any employee or third party to confidentially raise a concern regarding modern slavery and human trafficking.
- **Recruitment Policy** – To include provision of our commitment to the Modern Slavery Act 2015.
- **Agency Workers Policy** – When procuring agency workers we only use agency suppliers that undertake rigorous checks on each individual including; eligibility to work, references, qualifications, and proof of National Insurance (UK).
- **Human Rights Policy** - We focus on educating and raising awareness about modern slavery and human trafficking in order to improve standards.

#### **E. Training**

Our staff receive awareness-raising information to help them to identify signs of modern slavery and to aid their understanding of the various methods used by traffickers to exploit their victims. This training also encompasses guidance about our whistleblowing process and what to do when working with potential victims.

#### **F. Assessment of Effectiveness**

We recognise that our commitment to a zero-tolerance approach to Modern Slavery is a continual journey. We will continue to review and, where necessary, modify our processes on a regular basis.

The Board of WPI Group is responsible for implementing this statement and its objectives to ensure that modern slavery and human trafficking is not taking place within the Company or its supply chain.

This statement has been approved by the Board of Directors of WPI Group Holdings Limited and constitutes our modern slavery and human trafficking statement for the financial year ended 31<sup>st</sup> December 2018.

Signed by:



**Steven Igoe**  
**Director, WPI Group Holdings Limited**  
**April 2019**