



WCL907  
Rev 1  
June 2021

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introduction

Wildgoose Construction Limited welcomes the introduction of the Modern Slavery Act 2015 (the “Act”

The aim of the Act is in line with the Wildgoose Construction Company Values and Behaviours as updated in 2017 which include Family Feel and Compliance. Of particular relevance are those values relating to honesty, accountability and our selective approach to employing skilled subcontractors that share the Company’s values and work ethos. For this reason, we fully support those measures that seek to bring about increased transparency and scrutiny in our supply chains, in order to combat slavery and trafficking activities.

This Statement takes into account the introduction of various measures throughout our supply chain management from 2016 onwards, with the aim of reducing the risk of slavery and trafficking activities being present within our business operations.

We look forward to working with our partners, contractors and suppliers to achieve these aims, both immediately and in the future to combat slavery and human trafficking.

### Organisational structure and business

This statement covers the activities of Wildgoose Construction Limited:

Wildgoose Construction is a family owned main contractor, operating nationally with an annual turnover of in excess of £50m. The organisation has around 80 employees.

The Company is an experienced main contractor, with a proven track record of delivering multi-million-pound construction contracts in the public and private sector. These may include private social housing projects, care homes, extra care dwellings, medical centres, school and college buildings, fire and police stations, fast track pub restaurants and home building.

### Supply Chain

Our supply chains include:

- Consultants and advisers
- Contractors and Subcontractors
- Suppliers of goods, supplies and materials for all stages of the construction cycle
- Suppliers of plant and machinery

### *Countries of operation and supply*

The organisation operates in the United Kingdom only.

### *High-risk activities*

We have identified the following areas of the supply chain as comprising the highest risk of slavery and trafficking activities:

- Human trafficking – in circumstances when using subcontractor labour forces, where coerced / trafficked gangs may be present.
- Slavery and human trafficking – in circumstances when using materials such as ‘conflict minerals’ (tantalum, tin, gold or tungsten), steel, or other raw materials being predominantly sourced from countries with poor records on slavery and human trafficking.

### *Responsibility*

The personnel responsible for compliance with this Statement and the Anti-Slavery Policy, and for updating and improving our procedures in the forthcoming years, shall consist of involvement from the following departments:

- Senior Management
- Compliance and H&S
- Procurement
- Human Resources

This Statement and the Anti-Slavery Policy will be subject to regular and ongoing reviews (at least annually) to ensure its effectiveness, and to update the requirements where further measures are identified.

### **Relevant policies**

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

#### **Anti-Slavery policy**

- The practical measures that the Company has taken and will be taking throughout our operations are reflected throughout this Statement of Policy. This will be built upon and developed on an ongoing basis to incorporate best practice into our operations.

#### **Whistleblowing policy**

- The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

## **Supplier code of conduct**

- The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. All suppliers are provided with a copy of the Company's code of conduct for suppliers as part of the engagement process.

## **Due diligence**

We have a zero-tolerance approach towards slavery and human trafficking. To ensure all of those in our supply chain and our contractors comply with our Values, we have in place a supply chain code of conduct and compliance programme as outlined in the Procurement Flow Chart.

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Ensuring that all existing suppliers and subcontractors have been made fully aware of and confirmed their adherence to the Company's Anti-slavery Policy.
- Ensuring that new suppliers and sub-contractors undertake to comply with our Anti-Slavery policy through use of due diligence in the engagement process and relevant contractual provisions, with termination provisions for failure to comply.
- Ensuring that the high-risk areas identified are kept under regular review to determine whether additional and / or targeted measures are required within our supply chain to combat the risk of slavery and trafficking.
- Ensure that our whistleblowing procedure is drafted sufficiently widely to encourage whistleblowing in relation to any identified breaches of our Anti-slavery policy

The Company also seeks to raise awareness of Modern Slavery and Human Trafficking through its Policies and Procedures, copies of which are available to all employees and provided to new employees during their induction.

These systems have been put in place to:

- Identify and assess potential risk within our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle-blowers

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will be implementing training for all of our staff, highlighting the requirements of the Act and our Anti-Slavery Policy and its practical application in the workplace. This training will also be built into the Company induction process for new starters.

## **Awareness-raising programme**

As well as training staff, the organisation has raised awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

## **Statement update**

This statement was last updated and approved by the organisation's Chairman on 19 March 2020



Jonathan Wildgoose  
**Chairman**  
Wildgoose Construction Limited

**Approved by the Board of Directors on: 8 June 2021**

**Financial Year end: 30 September 2020**