

# WJ

## Anti-Slavery and Human Trafficking

### Introduction

The WatkinJones Group (WJG) is committed to providing a workplace and culture that supports a zero- tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

### What is covered by the Policy & Procedure?

This policy applies to all areas of the Company and supply chains. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Who is covered by the Policy & Procedure?

This Policy applies to all of our people employed by WatkinJones Group on either permanent or fixed-term contracts of employment – including to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

WatkinJones Group means Carlton, Planehouse and any subsidiaries of WJG.

The Company is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

### Responsibilities

The Board of Directors lead by the CEO, has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those employed by or working with the WJG comply with it.

The Compliance Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.





Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

All colleagues are invited to feed in to the policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Officer via [HREnquiries@WatkinJones.com](mailto:HREnquiries@WatkinJones.com)

### **What to do if you if you have concerns**

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All colleagues are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must speak to either your manager or the Compliance Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

All colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Corina Lewis, Compliance Officer.

### **Disclosure / Whistleblowing**

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Officer immediately or raise this under the Whistleblowing Procedure. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure and contact HR.



## Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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