ANTI-SLAVERY AND HUMAN TRAFFICKING STANDARD (SUPPLY CHAIN)

We conduct our business to the highest possible ethical standards, and we expect those that we work with whether as suppliers, customers, or partners to do the same. Modern Slavery is a serious crime, which sees vulnerable people exploited for financial gain. We understand that the construction industry faces particular challenges to ensure the ethical management of labour and we are dedicated to playing our part to address the serious impact of modern slavery in our sector. This document sets out the minimum labour standards we require from all members of our supply chain, including sub-contractors, suppliers and labour agencies. It must be read in conjunction with our Code of Conduct (a copy of which is available to download from www.wates.co.uk).

Any concerns that Modern Slavery may be occurring in our business or in our supply chain must be reported to Wates Ethics. Wates Ethics may be contacted by email: SpeakUp@wates.co.uk or via Safecall, our confidential reporting service on 0800 915 1571 or www.Safecall.co.uk/clients/wates

Governance

As a supplier to Wates you must ensure that:

- You comply with the requirements of this Standard.
- You provide evidence (when requested) that you have met the requirements of this Standard.
- You include obligations within your own supply chain agreements that are (as a minimum) equivalent to the requirements in this Standard.
- When sub-contracting recruitment or hiring, that the labour agencies you use operate legally and do not engage in behaviour that puts workers at risk of slavery or human trafficking.
- You and your supply chain adhere to all local and national laws relating to Modern Slavery and treatment of workers.

If you are having difficulty meeting the requirements of this Standard, you should notify us and we will work with you to put in place necessary improvements. From time to time we may conduct audits on our suppliers to measure compliance with these requirements.

Treatment of Workers

It is essential that those working within our business and our supply chains are treated with fairness, dignity and respect and are free from discrimination and exploitation. The following standards must be followed to meet this expectation:

Freedom of movement and to choose employment: Workers must not be subject to any form of forced or compulsory labour. Workers must be able to terminate their employment on reasonable notice and without penalty. Passports, travel, identification or work authorisation papers must not be withheld. Retaining personal documents must not be used to restrict workers freedom of movement. Workplace or employer or recruiter-operated residences must not be mandatory and where they are used, workers must not be confined to these residences.

Freedom of association: Workers must be free to organise, form and participate in groups, either formally or informally of their choosing.

Contracts of employment: Written contracts must be provided before deployment in a language that the worker understands. Workers must have clear terms relating to: employment conditions; rights and responsibilities; regular working hours; wages (including lawful deductions); pay cycle; benefits; overtime; leave entitlement and rest.

Protection of Young People: There must be no recruitment of child labour.

Safe and hygienic working environment: Adequate steps must be taken to prevent accidents and injury to health. Hazards inherent in the working environment should be identified and minimised as far as reasonably practicable. Workers must have access to clean toilet facilities and drinking water, and if appropriate sanitary facilities for food storage. Accommodation, where provided, must be clean, safe and meet the basic needs of workers.

Fees: Workers must not be charged any fees or costs for recruitment directly or indirectly, irrespective of the method of payment or who collects it.

Legal status: Workers must be legally authorised to work and have the necessary visas, work permits, and any similar legal documentary requirements. Right to work checks must be carried out before employment.

Pay and Benefits: Workers must be paid at least the minimum wage and benefits legally required. Wages must be paid on time and in line with laws and employment terms. Wages paid and hours worked (along with any lawful deductions) should be accurately recorded and workers should receive clear and transparent information. Workers must not have unlawful pay deductions and must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure or to keep workers tied to their employer or their jobs. Workers must not be held in debt bondage or forced to work to pay of a debt.

Working Hours and Rest: Workers must work within the legally allowed limits and must have appropriate rest and leave periods. Workers must not be forced to work overtime under the threat of penalty or dismissal and should not be forced to work overtime as a disciplinary measure.

Grievance: A grievance process must be in place by which workers can make complaints, including anonymously, and receive appropriate responses and timely updates on the status of concerns. Concerns may be raised through any process (formal or informal) without fear of retaliation, discrimination or harassment.

Discrimination and Harassment: There must be no discrimination or harassment based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation or any other characteristic prohibited by law. Workers shall be free from any harsh or inhumane treatment or abuse. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are not tolerated. Disciplinary policies and procedures must be clearly defined and communicated.

Spot the signs of Modern Slavery

Signs of physical or psychological abuse ● appearing frightened, withdrawn or confused ● not free to move and/or are always accompanied ● transported to/from work, possibly with lots of other people in one vehicle ● lack protective equipment, suitable clothing or training to safely do their job ● lack of access to their own documents, such as an ID or passport ● working unusually long hours ● do not have a contract, are paid less than the National Minimum Wage, or are not paid at all ● forced to stay in accommodation provided by their employer ● afraid to accept money or payment ●