

MODERN SLAVERY ACT 2015

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This statement sets out Western Electric Contractors Limited (or 'The Organisation') actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2020 to 31 March 2021.

As part of the Electrical Utility market sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

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.

Organisational structure and Supply chains

This statement covers the activities of Western Electric Contractors Ltd:

- Western Electric Contractors are sub-contractors within the electrical overhead powerline market. We construct, repair and maintain overhead powerlines and install wooden poles from 11Kv up to 33Kv sector, with an annual turnover of c£2M. We use UK based suppliers for electrical cutting and power tools, electrical testing equipment, including calibration services and PPE.

Countries of operation and supply

The organisation currently operates in the following countries:

- WEC has a head office based in Wendens Ambo, Essex and cover works throughout the UK and Ireland

The following is the process by which the company assesses whether activities or countries are high risk in relation to slavery or human trafficking:

- We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** As Managing Director Paul Cull is responsible for putting in place and reviewing policies and processes.

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- **Risk assessments:** As part of our initiative to identify and mitigate risk, where viable, we limit the geographical scope of our work to the UK and Ireland to ensure optimum supervision of the use of our skill set. Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour. With regards to national supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the food chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us to have a direct relationship with all links in the food chain, ultimately to the field or utility generator. We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- **Investigations/due diligence:** Any incidences of slavery and human trafficking that are identified will be notified to the Managing Director and HR department. The MD will then delegate an HR official or Business Manager to investigate and supply a report on activities found. Discussions and meetings will be arranged with any parties deemed to have exploited the act as soon as possible.
- **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 provide training to relevant members of staff. All Directors have been briefed on the subject.

- **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:

- **Whistle blowing policy** WEC 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. WEC's whistle blowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.
- **Employee code of conduct** WEC's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Supplier code of conduct** WEC 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. WEC 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. Primary supplier has been contacted with questionnaires regarding their policies on slavery and human trafficking, these are kept on records internally within WEC and deemed confidential.

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- **Recruitment/Agency workers policy** the organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Primary agencies will have been contacted with questionnaires regarding their policies on slavery and human trafficking, these are kept on records internally within WEC and deemed confidential.

Due diligence

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:

- Mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
- Conducting supplier audits or assessments through the organisation's own staff, which have more focus on slavery and human trafficking where general risks are identified
- Creating an annual risk profile for each supplier
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers through third party auditor and requiring them to implement action plans
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking
- Using SEDEX and Achilles, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking; and
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) considering the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring all staff working in the UK and Ireland to have been briefed and signed onto a Toolbox Talk on modern slavery by 1st June 2020;
- developing a system for supply chain verification expected to be in place by 1st June 2016, whereby the organisation evaluates potential suppliers before they enter the supply chain
- reviewing its existing supply chains expected to be completed by 1st June 2016, whereby the organisation evaluates all existing suppliers.

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 provide training to relevant members of staff. All Directors have been briefed on the subject and signed onto a Toolbox Talk

The organisation's modern slavery training covers:

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- Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation
- What external help is available, for example through the Modern Slavery Helpline, Gang masters Licensing Authority and "Stronger together" initiative
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

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.

Directors approval

This statement has been approved by the organisation's Managing Director, who will review and update it annually.



Paul Cull - Managing Director

Date: - 1st July 2022