



WYG plc and its subsidiaries \* (**WYG**) acknowledge that slavery and human trafficking represent gross violations of fundamental human rights. WYG fully supports the implementation of the Modern Slavery Act 2015 and seeks to operate in such a manner as to ensure, so far as possible, that slavery and human trafficking do not take place within our business or supply chains. We recognise the importance of transparency in our approach to tackling these issues and expect the same high standards to be held by our contractors, suppliers, investors and business partners. In the light of the UK Modern Slavery Act 2015 and the Government's Annual Report on Modern Slavery published in October 2018, WYG continues to take steps to minimise the risk of slavery issues in its operations and supply chains.

## WYG's Structure, Business and Supply Chains

As an international programme, project management and technical consultancy with a turnover of more than £150m, WYG comprises a number of limited UK and international companies headed by WYG plc. Due to the nature of our national and international development business, WYG's supply chains consist primarily of other professional service providers whose employees have qualifications and skills that are unlikely to be exploited through forced labour. We assess the risk of modern slavery and human trafficking occurring in our business to be low but we recognise that no organisation can consider itself immune or afford to be complacent.

## Our Policies on Slavery and Human Trafficking

WYG is committed to operating all aspects of our business in an ethical manner. Our Ethics Policy directly references our zero tolerance stance on slavery and human trafficking. Our Whistleblowing Charter also confirms that incidences and/or suspicions related to slavery or human trafficking must be reported. These and other relevant policies and procedures are reviewed annually and published on our intranet to ensure wide distribution. They are also part of our compulsory induction process for new employees.

## Due Diligence Processes for Slavery and Human Trafficking

Before they can start any work for WYG or on our behalf, our national and international suppliers are subject to strict checks to assess their compliance and suitability. Our Supplier Information Form and Pre-Qualification Questionnaires now directly enquire as to whether such organisations are covered by the Modern Slavery Act 2015 and, if they are, require them to provide a copy of their slavery and human trafficking statement pursuant to section 54(1). If they are not subject to the provisions of the Act, suppliers are required to provide details of their Modern Slavery Policy (or equivalent documents), any training or education offered and any due diligence processes they operate. The information received is scrutinised and further investigation taken where necessary.

## Assessing and Managing Risk

Our risk management processes seek to ensure that particular areas of risk in our business and supply chains are identified and impact assessments undertaken prior to the commencement of projects. In cases where a specific ethical concern has been raised, the ethical issues, including any related to slavery and human trafficking, will be referred to and considered by our Ethics Committee prior to the approval of project work.



### Training

Given WYG’s limited risk exposure and our enhanced due diligence and other processes in place, we have decided not to implement specific training in modern slavery and human trafficking at this stage. However, in circumstances where we consider there may be particularly high risks, appropriate training will be developed and targeted at those personnel who may have direct exposure. WYG’s Ethics Committee will review this stance periodically.

This statement, which is also published on WYG’s website, is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes WYG’s slavery and human trafficking statement for the financial year ended 31 March 2019.

\*Please refer to note 13 in the Annual Report and Accounts 2018 of WYG plc.

**Douglas McCormick**  
**Chief Executive Officer**  
**7 May 2019**

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| Title:               | WYG Slavery and Human Trafficking Statement 2019 |                      |               |
| Owner:               | Company Secretary                                | Version:             | 2019/1        |
| Date of last review: | 31 March 2019                                    | Date of next review: | 31 March 2020 |