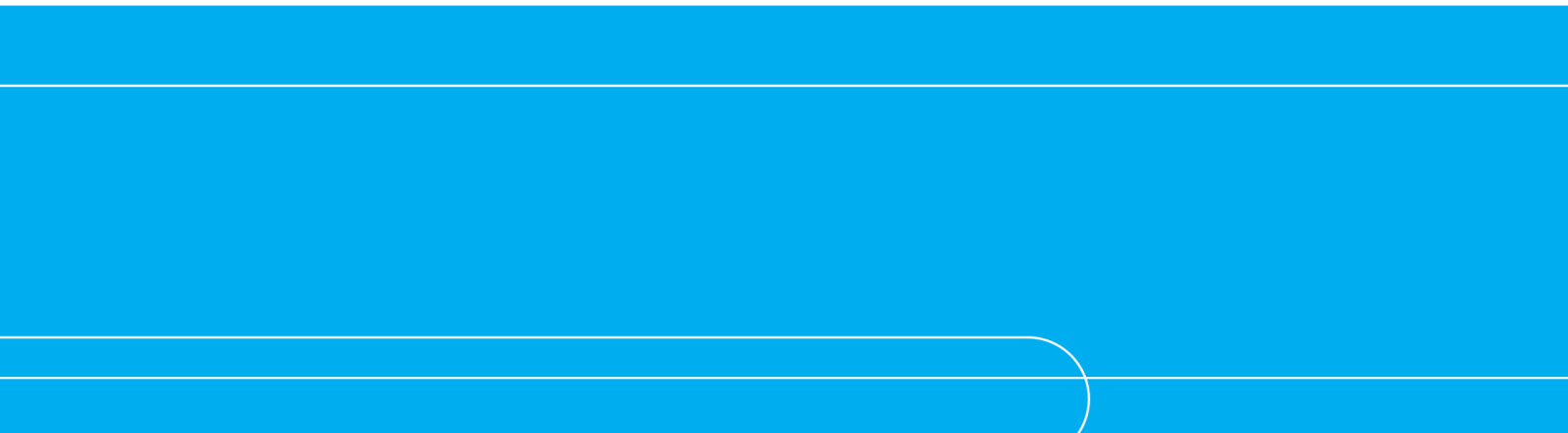


Responsible Procurement Declaration

September 2023



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Issue 1, September 2023

1. PURPOSE

Our responsible Procurement declaration presents some basic principles for working with VolkerWessels UK (VW UK). (Note: Term 'Supplier' includes sub-contractors, agents, suppliers of goods, services, plant, and products. Ref RPD07/2023).

VW UK seeks to be a responsible buyer of goods and services. We set the highest standards to ensure that all our business is conducted ethically, sustainably and within the laws of the country that we operate in. We also expect our suppliers to comply with all applicable local, national, international laws and regulations (including regulatory bodies) and to respect internationally recognised human and labour rights.

This declaration is applicable to our esteemed supply chain partners across diverse sectors, categories, and service providers, encompassing micro, small, medium, and large enterprises.

2. GUIDANCE

2.1 Abbreviations and Definition of Terms

VW UK - VolkerWessels UK

FIR - Fairness Inclusion and Respect

CE - Cyber Essentials

SME - Small and Medium Enterprises

VCSE - Voluntary, Community and Social Enterprises

2.2 Health and Safety

VW UK recognises that it has a legal and moral duty of care for the health, safety, and welfare of our employees and those that may be affected by our activities.

Health and safety is at the top of our agenda and we continually strive to prevent work related injuries and the ill-health of our employees, and anyone associated with our activities, whilst also improving their wellbeing.

VW UK maintains clearly defined management systems, interfaces and responsibilities that are understood and accepted by all. Maintaining effective oversight and scrutiny processes, carried out with independence and impartiality, we comply with corporative, legislative, and other requirements and we always seek further improvements.

Respect for people is innate within our company. We take into full consideration the needs and circumstances of all our employees, clients, colleagues, and those we work with. We provide a safe working environment and build a culture in which ethical business practice thrives.

We recognise that to continue tackling health risks in construction, both physical and mental, we must first raise awareness and offer support and guidance towards maintaining an environment free of work-related ill-health.

Everyone working on our behalf is required adhere to our requirements, by co-operating and carrying out activities safely, and in such a manner that does not intentionally or recklessly interfere with, or misuse, anything provided in the interest of health, safety or welfare.

2.3 Drugs and Alcohol

VW UK is committed to maintaining healthy, safe and productive working conditions throughout its activities. We recognise that alcohol and drugs have an impact on an individual's ability to work safely and correctly and, as such, aim to provide an environment free from the misuse of drugs and alcohol.

VW UK operates a strict *VolkerWessels UK Drugs and Alcohol Policy* which must be adhered to. All subcontractors and suppliers must be aware of the requirements and the implications of failing to comply.

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2. GUIDANCE (CONTINUED)**2.4 Fairness Inclusion and Respect (FIR)**

At VW UK we are fully committed to creating a diverse workforce and strive for an inclusive culture that nurtures people of all genders and backgrounds.

We strive to achieve meaningful, sustainable changes. Leadership and culture changes are led by the senior management team. Our Chief Executive Officer, Richard Offord and the VW UK Board actively sponsor our FIR strategy, ensuring momentum and to promote a true cultural shift throughout our organisation.

Ultimately, VW UK wants to be an employer of choice for high quality, talented people no matter their gender, sexuality, race, ethnicity, social background or religion, not only because this is the right thing to do in a multi-cultural society, but because it makes us a better business. We want to create a cohesive, high-performing team, by bringing together different opinions and perspectives and ensure that everyone feels valued and comfortable with being themselves.

2.5 Modern Slavery

We comply with the UK Modern Slavery Act 2015 and, in addition to our *VolkerWessels UK Modern Slavery Policy*, issue an annual compliance statement that can be found on our website. Our supply chain consists of around 5,000 suppliers. VW UK recognises that it has a responsibility to take a robust approach to slavery and human associated practices.

We have robust systems and procedures in place to help ensure we operate an open, honest and ethical business. By implementing our policies and working with our suppliers, we aim to be the partner of choice for our customers and to operate ethically and responsibly.

2.6 Employment

As a responsible employer, VW UK is committed to promoting equal opportunities for all our employees, clients, communities, suppliers and contractors, whether permanent or temporary. VW UK will not discriminate based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex, or sexual orientation. Everyone shall be treated with fairness.

We expect all businesses in our supply chain to respect the people they employ directly or indirectly and offer a safe workplace that is free from harm, intimidation, harassment or fear. Furthermore, we expect that businesses will ensure that working hours are not excessive and comply with national laws or benchmark industry standards whichever affords the greater protection.

We believe that paying a decent wage is good for the people who work for us and it makes good business sense too. We encourage our suppliers to pay fair market rates for all trades and disciplines whether site or office based.

2.7 Information Security

Suppliers should protect confidential information belonging to or vested in VW UK in accordance with all relevant laws, and act to prevent its misuse, theft, fraud, or improper disclosure. Suppliers must take due care in handling, discussing or transmitting sensitive or confidential data or information that could affect VW UK, its employees, its customers, the business community, or the public, even after their contract with VW UK has expired.

2.8 Cyber Security

In order to protect VolkerWessels UK, its clients and the wider supply chain from cyber- attacks, the company requires members of its supply chain to achieve Cyber Essentials (CE) accreditation, or evidence that equivalent standards are met, to the satisfaction of VolkerWessels UK's Chief Digital Officer. CE is a cyber security self-assessment accreditation, backed by the UK Government, which is aimed at assisting an organisation in protecting themselves from a wide variety of the most common cyber-attacks. A higher standard 'Cyber essentials plus' is an enhanced version with a third party accreditation and this is recommended, although not mandatory for now.

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2. GUIDANCE (CONTINUED)**2.9 Ethics in the market**

At VW UK there is zero tolerance of corruption or bribery of any kind. We are committed to conducting our business in an open honest ethical and principled way and expect all of our employees and those who work with us to behave in this manner at all times.

Suppliers must comply with the Bribery Act 2010 and the terms of our *VolkerWessels UK Anti-Bribery and Corruption Policy* and must not engage in any form of bribery and / or corruption or offer any inducements to any VW UK employee, their family, or friends in order to win or retain VW UK business.

Suppliers must keep current, accurate written accounts of all payments (including gifts, meals, entertainment, and anything of value) made on behalf of, or from funds provided by VW UK and should make a copy of these accounts available upon request.

In addition, VW UK does not tolerate any form of tax evasion or facilitation of tax evasion by any of its suppliers. We expect our suppliers to have in place policies and procedures that are reasonable to prevent the facilitation of tax evasion, in accordance with guidance issued under the Criminal Finances Act 2017 (section 47).

2.10 Prompt Payment, Accounting and Business

VW UK will pay suppliers in accordance with agreed payment terms and that outstanding monies as a result of disputes or complaints will be dealt with through our system. We expect the entire supply chain to be paid in accordance with fair and reasonable terms in a similar manner.

Accurate, reliable information and records are critical to meeting our charter principles and financial, legal and management obligations, and to fairly reflect VolkerWessels UK's transactions. The supplier and VW UK must keep accurate records of all matters related to the supplier's business with VW UK.

2.11 Environment and Sustainability

At VolkerWessels UK, it is our ambition to deliver projects that demonstrate excellence in terms of design, construction, and engineering excellence. These projects enhance the way we live, through innovative engineering solutions across the civil engineering and construction sectors including rail, highways, airport, marine, energy, water, and environmental infrastructure, but only if delivered sustainably, responsibly and with a desire to unlock the long-term social value embedded within these projects.

We will continue to respect our workforce as the foundation of our business by making safety and wellbeing a priority, forging relationships with likeminded clients and supply chain partners, actively seeking to explore our collective ambition to deliver long-term social value and support our workforce and supply chain in delivering VolkerWessels UK's sustainability ambitions.

We operate in a fair and ethical manner and publicise our desire to work alongside a network of likeminded supply chain partners. Our aim is to raise awareness of the benefits that sound sustainability practices can bring throughout our supply chain, and we understand that this will be best achieved by seeking two-way engagement.

2.12 Community Engagement and Social Value

VolkerWessels UK's vision is to be the construction contractor of choice by always exceeding our stakeholders' expectations, being sustainable, innovative, and future - oriented. It is our desire to grow responsibly, with respect for communities and the natural environment, and to leave a legacy we are proud of.

Making responsible and forward-thinking choices about the way our projects are executed, and how they will deliver social value, will support our overall vision to be the contractor of choice and encourage us to be a good neighbour in the communities in which we work.

In addition to our focus on the use of SME's across the business, we will also continue to broaden our supply chain to include Voluntary, Community and Social Enterprises (VCSE's) as well as local suppliers and contractors.

We encourage our suppliers to engage with the local community and wider local / regional business partnerships to promote and appoint apprentices and management trainees.

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2. GUIDANCE (CONTINUED)**2.13 Conflicts of Interest**

Suppliers should avoid any interaction with VW UK employees that may conflict, or appear to conflict, with any employee acting in the best interests of VolkerWessels UK.

Suppliers should not employ or otherwise make payments to any VW UK employee during any business transaction (other than pursuant to the VW UK contract).

If a supplier employee is a family relation to any VW UK employee, or if the supplier has any other relationship that might represent a conflict of interest, the supplier should disclose this fact to VW UK and ensure that any VW UK employee does so.

2.14 Reporting

Suppliers who believe that a VW UK employee, or anyone acting on behalf of VolkerWessels UK, has engaged in illegal or otherwise improper conduct should report the matter to VolkerWessels UK.

A confidential whistleblowing hotline is available to all employees and Suppliers. This number is 0044 (0)1992 305118.

Suppliers similarly should report any potential violation of policy principles. A supplier's relationship with VW UK will not be affected by an honest report of potential misconduct.

2.15 VolkerWessels UK Policies

This *VolkerWessels UK Responsible Supplier Declaration* shall be read in conjunction with various specific VW UK policies and guidelines as they are introduced and amended from time to time. Please seek further information from the individual operating business as appropriate.