



## **Introduction to Tideway's Slavery and Human Trafficking Statement from the Chief Executive Officer, Andy Mitchell**

With the alarming increase in instances of enslavement and people trafficking in recent years, the Modern Slavery Act 2015 seeks to put in place certain safeguards to help prevent these horrendous crimes.

Tideway has zero tolerance to all forms of exploitation, whether it be enslavement, people trafficking, intolerance or inequality.

Our slavery and human trafficking statement sets out the steps the company has taken to ensure that the Thames Tideway Tunnel project adheres to all relevant legislation and that our employment practices are fair, open and above board.

Tideway has sought and obtained assurances from our joint venture business partners that the supply chains into the project are free from such abuses, something we will monitor regularly.

In line with this legislation, I fully endorse Tideway's second slavery and human trafficking statement.



**Andy Mitchell CBE, FREng**

Chief Executive Officer, Tideway



## **Tideway's Modern Slavery Statement 2017/2018**

Slavery and human trafficking, together referred to as 'modern slavery', are atrocious forms of organised crime in which people are treated as commodities and exploited for criminal gain. The International Labour Organisation ('ILO') estimate that 21 million people (or three out of every thousand people) worldwide are working in conditions of modern slavery, many of whom are trafficked persons.

We at Tideway are committed to our practices to combat modern slavery, as defined in the Modern Slavery Act 2015 ('Act'). Tideway itself does not meet the turnover threshold under section 54 of the Act so we are not required to publish a slavery and human trafficking statement ('Modern Slavery Statement') every year. However, Tideway has chosen to adopt the requirements and high standards contained in the Act in order to strive towards increasing transparency in both its business and supply chain.

### **The Structure of the Organisation**

Bazalgette Tunnel Limited ('BTL') is the licensed infrastructure provider set up to finance, build, maintain and operate the Thames Tideway Tunnel. BTL trades as and is known to the public as 'Tideway'.

Tideway is owned by a consortium of investors that comprises Allianz, Amber Infrastructure, Dalmore Capital and DIF. We work closely with our investors who all have extensive experience of investing in and managing a wide range of infrastructure assets both in the UK and overseas.

With more than 400 employees and contractors delivering the Thames Tideway Tunnel project (the 'Project'), Tideway has its headquarters and operates solely in the United Kingdom. The Project is organised into three business units: Tideway West (constructing the tunnel between Acton and Fulham), Tideway Central (constructing the tunnel between Fulham and Bermondsey) and Tideway East (constructing the tunnel between Bermondsey and Stratford).

The construction companies that comprise Tideway's supply chain include: BAM Nuttall, Morgan Sindall, Balfour Beatty Group, Ferrovial Agroman UK, Laing O'Rourke Construction, Costain, Vinci Construction Grands Projets and Bachy Soletanche – these are the joint venture consortiums contracted to build the tunnel. A further contractor is Amey, who is the System Integrator, responsible for providing process control and communication equipment and software systems for operation, maintenance and reporting across the tunnel system.

### **Tideway's Stance on Modern Slavery**

Tideway is continually working towards ensuring that there are no instances of modern slavery in our supply chains or in any part of our business. Tideway's anti-slavery stance 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 that modern slavery is not taking place anywhere in the Project.

Tideway has recently achieved the BRE Ethical Labour Sourcing Standard in accordance with BES 6002 (2017) and received a Statement of Verification as evidence of the same. The BRE (Building Research Establishment) conducted interviews with various departments across Tideway to review the maturity of our ethical supply chain practices, particularly in relation to



our Modern Slavery Statement, commitment to paying the London Living Wage and responsible sourcing of materials. This award is testament to our commitment to operating an ethical and transparent supply chain.

### **Supplier Adherence to Our Values**

Tideway has zero tolerance towards any form of modern slavery. To ensure all those in our supply chain and third-party contractors adhere to our values, we have in place a compliance programme which requires the joint venture consortiums to ensure they are compliant with the Act and to provide confirmation of that on a regular basis.

We expect our business partners, subcontractors and suppliers to:

- Ensure employees have the freedom to choose to work for them and to end that employment after a mutually agreed notice period.
- Ensure employment is not forced, bonded or non-voluntary prison labour.
- Demonstrate a commitment to equality of opportunity for all individuals free from discrimination and oppression.
- Offer working hours that are not excessive and are compliant with national laws or industry standards.
- Have appropriate disciplinary, grievance and appeal procedures in place.
- Have a confidential whistle-blowing process in place where all reported instances are investigated thoroughly, with assurances given to the victims they may give evidence without fear of conviction for offences committed in connection with their enslavement or trafficking. A person is not guilty of that offence if compelled to act as a result of enslavement or relevant exploitation.
- Ensure appropriate health and safety measures are in place to protect the workforce and the wider public.
- Offer wages and benefits at least in line with industry benchmarks or national minimums.

Earlier this year, we received assurances from our joint venture consortiums and Systems Integrator regarding their compliance with our values. Each company provided us with at least one of the following documents to demonstrate alignment with Tideway's zero tolerance approach to modern slavery:

- Slavery and human trafficking statement (if they meet the criteria in section 54 of the Act requiring a statement to be published)
- Code of Ethics/Ethical Policy
- Policy/Guide on Human Rights
- Corporate Responsibility Policy
- Evidence of staff training on ethics, including modern slavery

### **Due Diligence Processes for Modern Slavery**

As part of our initiative to identify and mitigate risk, we have in place systems to ensure that:

1. Staff, including our joint venture consortiums, participate in the Action Programme for Responsible and Ethical Sourcing ('APRES') and comply with the ILO's Ethical Trading Initiative.



2. Staff are aware of our policies, procedures including our anti-bribery and anti-corruption procedures and attend events to increase awareness in the complexities of human rights and ethics in the supply chain.
3. Staff undertake mandatory training on a regular basis.
4. Our contractors have similar policies and training programmes in place.
5. New suppliers meet Tideway standards in ethics and human rights via the Tideway new supplier process.
6. All those working on the Project have a confidential 24-hour whistleblowing helpline, allowing them to ask questions, raise concerns or report violations of our ethical and human rights stance. Any such contact with the whistleblowing helpline is dealt with by the Head of Internal Audit who reports this to both the CEO and the Board Audit Committee, suitably anonymised.

### **Procurement Risk Assessment Strategy**

Since the publication of our last Modern Slavery Statement 2016/17, our Procurement team have developed a Supply Chain Risk Assessment Process for Modern Slavery. As a procurer of goods and services, it is becoming increasingly important that we undertake our own risk assessment of modern slavery in our supply chain.

To assess the prevalence of modern slavery practices within our supply chain, we have used a methodology based on the Global Slavery Index. Whether we take a supplier through to further due diligence on their practices depends on our risk assessment, which is based on the answers to three questions:

1. Does the supplier have a Vulnerability to Modern Slavery score of over 50 out of 100?
2. Does the supplier have a Government Response Rating of CCC or below?
3. Does Tideway source goods or services from industries that have a prevalence of modern slavery, e.g. clothing and footwear; manufacturing; agriculture; construction; mining; electronics; events and catering; cleaning services?

Amongst various risk variables – for example, governmental response, inequality and lack of basic needs – the supplier's country of origin is a key component of our risk assessment.

Any supplier with a YES response to any of the above questions will be required to provide further information to Tideway by way of a self-assessment questionnaire. We will then conduct a risk assessment based on the supplier's response to understand whether there is evidence of modern slavery and whether there are sufficient controls in place within that organisation to mitigate that risk.

### **Right to Work**

All our employees have a written contract of employment, and their right to work in the UK is established prior to their employment commencing. All employees are made aware of their statutory rights and in-work benefits during their induction process. Our onboarding process includes an automated red flag raising system which identifies employees of Tideway and our joint venture consortiums who:

- Do not have the right to work in the UK;
- May not be earning the London Living Wage; and/or
- Have unusual domestic or travel arrangements.

Any employees identified using this system are subject to further investigation.



## Policies and Training

To ensure a high level of understanding of the risks of modern slavery in our business and supply chains, we provide training to our staff during their induction process.

We also have the following policies in place:

- Anti-Fraud, Corruption and Bribery Policy
- Anti-Money Laundering Policy
- Bullying and Harassment Policy
- Equal Opportunities Policy
- Grievance Policy
- Honest and Ethical Behaviours Policy
- Whistleblowing Policy – supported by the anonymous Crimestoppers UK whistleblowing hotline

Once staff have joined Tideway, they will continue to receive training across all ethical and human rights topics, including modern slavery. Training sessions are a mixture of online learning, short presentations, and lunchtime drop in sessions usually run by the senior management team. A regular and appropriate level of training is vital to keep staff abreast of these important issues.

More specifically, our modern slavery training focuses on the importance of the Act and how to identify warning signs and anomalies in the workplace.

## Approval

This Modern Slavery Statement has been approved by the Board and shall be updated annually.

Signed:

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**Andy Mitchell CBE, FREng**

Chief Executive Officer, Tideway

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**Sir Neville Simms FREng**

Chairman, Tideway