



WILSON JAMES MODERN SLAVERY STATEMENT

AUGUST 2023

Our CEO Commitment

As 2023 continues to be economically challenging, it is important that companies like ours that rely on a significant workforce to deliver services are even more vigilant to modern slavery. We are acutely aware of the cost-of-living crisis and the tough challenges to businesses and their supply chains. This could present a perfect breeding ground for increased exploitation of innocent people in need.

At Wilson James, doing business in the right way is integral to who we are. Modern slavery is a crime and violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking. All of these deprive a person of their liberty in order to exploit them for personal or commercial gain. We are committed to improving our practices to help combat slavery and human trafficking within our business and demand those same high standards of our suppliers.

As part of Wilson James' efforts to monitor and reduce the risk of modern slavery and human trafficking occurring within our business and supply chains, we seek to:

- Design our recruitment processes so that they are transparent and regularly reviewed. This includes having robust vetting processes in place in the appointment of our colleagues.
- Raise awareness of modern slavery amongst our people and our suppliers to help them be alert to the hidden nature of modern slavery.
- Challenge and support our suppliers in the effort to drive out modern slavery and human trafficking; and
- Apply the spirit, as well as the letter of the law, to our internal practices.

We take the following actions to ensure Wilson James prevents modern slavery or human trafficking:

- Provide mandatory Modern Slavery training for all staff in management positions in 2023/24.
- Implement Supply Chain Risk Assessments prior to appointment of suppliers.
- Regularly review our recruitment and vetting processes.
- Benchmark our approach to managing the risk of modern slavery.

This Policy is communicated to all persons working under the control and supervision of Wilson James so that they understand and support our commitment to ensure that Wilson James' reputation never becomes tainted by association with modern slavery or human trafficking.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Wilson James Limited's slavery and human trafficking statement for the financial year ending July 2023.



A handwritten signature in black ink, appearing to read 'Mark Dobson'.

Mark Dobson
Chief Executive Officer





Our organisation structure

Wilson James is a security, logistics, technology, and people solutions provider.

We are still privately owned and headed by our cofounders and have grown from a small Essex-based outfit to a £250m business that counts leading British and global brands in its prestigious client base. Our solutions range from bespoke consultancy and analysis to supply chain and material management and integrated security, technology, and logistics solutions. Our colleagues can be found on national infrastructure projects, at high profile cultural heritage institutions, and securing passenger safety and assistance at the UK's largest airports, and more.

We are dedicated to the creation of safe, secure, and logistically efficient workplaces; delivered with passion and pride, through people and technology. We aim to be our client's first choice in partnerships in all our business activities, an employer of choice for the industries we service, and a client of choice to our supply chain.

We know that delivering on this aim requires a well-trained and motivated workforce and a robust and trusted supply chain, sourcing expert partners with rigorous commitments to excellence and a duty for us to do business responsibly.

Our purpose & values

Our core values are the heart of our brand and inform activity at every level of our operations. They are Honesty, Respect, Safety, Responsibility and Communication.

These values guide our investment programme, our people offering and resources, our bid activity, and our client and supplier relationships. They are the standard by which we measure ourselves, and by which we evaluate potential service partners. They also inform specific evaluation criteria, e.g., the ability to measure environmental impact, demonstration of product quality and responsible sourcing/production, transparency in reporting where required.

**Honesty, Respect,
Safety, Responsibility
and Communication**

Our people

Wilson James employs over 5,000 people across a range of specialist services, including Security, Aviation, Construction Logistics, Technology and Advisory Services. We service 100's of clients who together make up our large diverse customer base of professional organisations. Wilson James operates across the UK and NI.

We are proud to be recognised by the Living Wage Foundation as a Living Wage Recognised Service Provider. This means we pay the real Living Wage to our colleagues working on our own sites and we always supply a Living Wage bid option alongside every market rate submission to all current and prospective clients.

We directly employ most of our workforce. We conduct robust checks on any new employee including eligibility to work in the UK and adherence to the BS7858 standard where appropriate to safeguard against human trafficking or individuals being forced to work against their will. Where we supplement our directly employed workforce with agency labour, we use only specified and reputable employment agencies to source labour and always verify the practices of any new agency prior to accepting workers.

We are proud of our Inclusion agenda and have ambitious plans to build a culture of Equality, Diversity, and Inclusion where the unique experiences, skills and insights of our people are valued and included, making our business stronger, more innovative, and insightful and fully embracing our values so that everyone who works for, or with, Wilson James is consistently valued and respected.

Our inclusive recruitment strategy is a core part of our EDI strategic approach. We put processes and training in place to ensure our recruitment is fair, inclusive and barrier free, attracting and recruiting the very best person for the job and embracing the diverse perspectives they bring.



Our Supply chain

We believe that our suppliers are integral to our success. Our suppliers help us enhance our business and values and we are committed to ensuring that together we are a force for good. For this to happen, we need to select, engage, and treat our suppliers fairly and responsibly. Equally we expect our suppliers to be legally compliant, ethical, and sustainable.

This matters because good, professional relationships with our suppliers are key to our service delivery. Our suppliers are an extension of our business, and we want them to be and bring their best. That's why it's important that we are open and inclusive about the way we select, engage, and manage our suppliers, so that it provides a solid foundation to listen and implement innovation.

What it means

- We select business partners fairly and objectively against our criteria to confirm suitability for us to engage and contract. This includes ethics, sustainability and Privacy & Data Governance.
- We seek to put in place commercial and contractual conditions that fairly reflect the specific requirements of the procurement and market conditions.
- We are a signatory to the Prompt Payment Code so that our suppliers are paid on time.
- We treat our suppliers with dignity and respect and foster an inclusive working environment.
- We incentivise sustainable strategies among our suppliers, monitor their performance and drive positive change wherever we can.
- We monitor and audit our suppliers through the life of the contract to provide assurance that our suppliers are compliant partners in our service delivery.

This year, we also intend to launch:

1. A Wilson James Supplier Code of Conduct. This is a version of the Wilson James Code of Conduct cascaded to our suppliers so that they understand how we discharge our corporate and ethical responsibilities.

2. A dedicated microsite for our suppliers so that we can make it clear to the market who we are and what we care about and help encourage competition and diversity into our supply chain.



Our Training

Leadership at all levels is key. This statement sets out the Board's commitment. We are committed to improving the skills and awareness of our managers so that they can be vigilant and act when required.

We mandate annual training on modern slavery for all staff in management positions. This year we will provide improved training through our accredited partner. Our current training covers:

- what is meant by modern slavery.
- 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 our organisation.
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative?

Awareness programme

We believe that improved awareness is one of the most effective methods of preventing modern slavery. As well as training staff in management positions, we will this year raise awareness of modern slavery issues by putting up posters across our workplaces and sharing a short 'toolbox talk' video.

The posters and video will 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 our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

We will also raise awareness on Anti-Modern Slavery Day on 18 Oct 23.

Our People networks, listening events and surveys along with our improved methods of colleague communication supplement our Whistleblowing procedure to provide our colleagues with multiple ways to help us prevent modern slavery.



Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- issuing an awareness campaign to all our sites to coincide with Anti Modern Slavery day on 18 Oct 2023.
- requiring all our managers to have completed our new training module on modern slavery by 1 Apr 2024.
- refreshing the content of our established system for supply chain verification so that all onboarding records are held centrally are updated by 31 Jul 2024 and a review process is established.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:



Policies

The Executive Director Business Improvement, Chief of Staff and Operational Readiness Director will ensure that appropriate policies are in place to ensure good governance of the Company's approach to Anti Modern Slavery.



Risk assessments

- The Company operates a risk management procedure which is overseen by the Risk & Audit Committee, a sub-committee of the Executive Board. The board is chaired by a Non-Executive Director who is Whistleblowing Champion. The committee will receive an annual update on Modern Slavery.
- The Company will conduct a benchmarking exercise at the start and end of the year using the Stronger Together Labour Provider good practice check list.



Investigations/due diligence

Our Internal audit team conduct site, agency, and supplier audits. Suppliers are required to evidence their compliance with legislation during our onboarding process.



Training

The Chief of Staff plans and delivers our training for managers through our Learning & Development function and our plans this year for an awareness programme for all our employees.

Policies

Our Sustainable Ethical Procurement Policy sets out our legal and moral expectations of our suppliers for regulatory compliance, employment, right to a living wage, avoidance of excessive hours, protection from discrimination and provision of a safe and healthy working environment. Wilson James holds itself to these same standards and has an effective internal audit system to ensure that we do not fall short.

Our Code of Conduct sets out our standards and expectations about behaviour and conduct to all our colleagues and suppliers. Our Code of Conduct is supported by our Employee Handbook which provides further information.

Our Whistleblowing & Disclosures in the Public interest policy encourages all our employees, clients and business partners to report any concerns related to the direct activities of the company or those of its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's Whistleblowing procedure is designed to encourage and protect those who come forward and is supported by a reporting hotline, which is independent and confidential.

Our Equality Diversity & Inclusion policy mandates the application of equal opportunities in all aspects of recruitment.

Documents related to this policy:

G20 Modern Slavery

F05 Sustainable Ethical Procurement

G07 Sustainability

G09 Ethics

Code of Conduct

HR09 Equality Diversity & Inclusion



 info@wilsonjames.co.uk

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 www.linkedin.com/company/wilson-james