



# Modern Slavery Statement

**1st August 2024**

# Our CEO Commitment

**At Wilson James, doing business in the right way is integral to who we are, and we believe that respect for human rights is fundamental to our core values and the way in which we conduct our business. Modern Slavery, in all its forms, is a grave violation of these human rights and an affront to human dignity.**

**We are committed to playing our part in eradicating these practices and ensuring that our operations and supply chains are free from Modern Slavery.**

As CEO of Wilson James, I am dedicated to fostering an organisational culture that prioritises ethical behaviours, transparency and accountability. Our commitment to combating Modern Slavery is integral to our broader ambition to be a responsible and sustainable business.

We understand that Modern Slavery is a complex and ongoing challenge, which is why we are committed to continuously improving our policies, processes and practices to ensure they are robust and effective.

Our efforts are guided by national and international frameworks including the United Nations Guiding Principles on Business and Human Rights, and the Modern Slavery Act 2015. Where possible, we also seek to collaborate with industry peers, policymakers, and other stakeholders to amplify our impact and contribute to broader systemic change.

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 for 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 2024/5.
- Provide awareness training to all our colleagues in 2024/5.
- 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 statement 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.

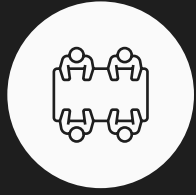
This statement is made pursuant to **Section 54(1) of the Modern Slavery Act 2015** and constitutes Wilson James Limited's slavery and human trafficking statement for the financial year ending July 2024.

Together, we can make a significant difference in the fight against Modern Slavery and uphold the rights and dignity of all individuals involved with our business.

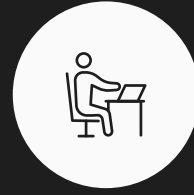


**Mark Dobson**  
Chief Executive Officer

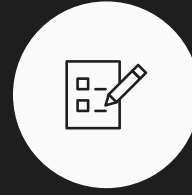
# Highlights from FY 2023/24



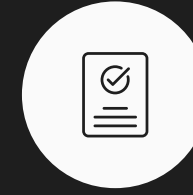
We set up our Modern Slavery Working Group. This brings together colleagues with responsibility and influence in the area so that we take a planned approach and make progress.



We deployed a Learning Management System which will be accessible to all our colleagues, including agency workers. As well as delivering Modern Slavery training, the platform is enhancing our engagement more broadly with our colleagues.



We conducted and reviewed a risk assessment on our Recruitment processes, improving our understanding of our risks and putting in place mitigating action where necessary.



We launched our Wilson James supplier code of conduct. This provides guidance to our suppliers about what we care about and how we discharge our corporate and ethical responsibilities.



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

## Our organisational structure

Wilson James is a security, logistics, technology, and people solutions provider. We are privately owned and led by our co-founders who since 1991 have grown our organisation from a small Essex-based outfit to business turning over £250m per annum and counting leading British and global brands in its prestigious client base. Our solutions range from bespoke consultancy and analysis to supply chain and material management, as well as integrated security, technology, and logistics solutions.

Our colleagues can be found supporting a variety of operations including those at national infrastructure projects, high profile cultural heritage institutions, and securing passenger safety and assistance at the UK's largest airports.

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 Values

Our core values are the heart of our brand and inform activity at every level of our organisation. 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

We are fair and honest in all our activities.



## Respect

We treat each other with dignity and respect.



## Safety

We will continuously develop safe systems of work.



## Responsibility

We are responsible for all our actions and accountable for their consequences.



## Communication

We have an environment that enables and supports communication.

# Our People

Wilson James employs over 5,500 people across a range of specialist services, including Security, Aviation, Logistics, Infrastructure, Technology and Advisory Services. We service over 250 clients across 300 site locations within the UK and Northern Ireland who together make up our large diverse customer base of professional organisations.

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 people networks help us create this culture, energising our work in areas which support prevention of modern slavery, for example Domestic abuse and Violence against women and girls.

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

Our Wellbeing Strategy also plays an important part in preventing modern slavery. We intend to refresh this, led by a dedicated Wellbeing Manager, so that it is best oriented and resourced to meet our future ambition and contemporary challenges.

# 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 ensuring 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 their contract to provide assurance that our suppliers are compliant partners in our service delivery.

## Launched this year

1.

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.

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. We also made our whistleblowing hotline available on this website for our suppliers to alert us anonymously if they need to.

# Our Modern Slavery Supply Chain Roadmap

## Awareness & Governance

Understanding and building awareness of our compliance obligations with our supply chain.

Introducing an annual audit of high-risk categories e.g. labour agencies.

2018-2021



## Creating a Risk-Management Structure

Creation and implementation of our supplier due-diligence processes and checks.

Refreshed supplier contracts.

Introduction of a Wilson James supplier microsite and Wilson James supplier chain code of conduct.

Provision of whistle-blowing facility.

Deeper analysis of high-risk categories.

2021-2024



## Leveraging Insights to be Better

Leveraging insights from our risk management structure.

Evaluating the effectiveness of our processes through feedback and data.

Benchmarking our approach to managing the risk of modern slavery.

2024 - Forward



Our progress to date and direction of travel is laid out in the diagram above.

Our key focus and objective for FY 2024/25 is to carry out a deeper analysis of high-risk supply chain categories. This will allow us to put in place more specific checks and risk mitigation strategies.

# Our Training

Leadership at all levels is key. This statement sets out the Board's commitment 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 employees in management positions. This year we will deploy improved training from our accredited partner on our Learning Management System.

## Our 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?

We believe that improved awareness is one of the most effective methods of preventing modern slavery. As well as training employees in management positions, we will this year provide 'toolbox' training from our accredited provider to all our colleagues.

This training as well as that provided to managers will be delivered through our new Learning Management System; this platform delivers learning, development and training to all our colleagues including agency workers and represents a significant investment in ensuring that everyone that works under Wilson James' direction understand their part in preventing modern slavery.

## The training will explain to employees:

- 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 during Anti-Modern Slavery Week in October 2024.

Our People networks, listening events and surveys along with our Whistleblowing procedure provide our employees with multiple ways to help us prevent modern slavery.

We will also deploy a new communications platform which will enable us to reach our entire workforce and enable them to reach us through improved surveys; we want this to make us better informed and able to respond to our employees concerns.

# Performance indicators

We have reviewed the key performance indicators (KPIs) that were set in our previous Modern Slavery Statement and are proud to have met these objectives.

As a result, we have refreshed our KPIs for the coming year as follows:

Delivering an awareness campaign to coincide with Anti Slavery week in October 2024

**(KPI: issued to 100% managers).**

Requiring all our managers to have completed our new training module on modern slavery by 1 Apr 2025.

**(KPI : 95% managers complete the training module).**

Requiring all colleagues to complete our modern slavery toolbox training by 31 Jul 25.

**(KPI: 75% directly employed colleagues complete the toolbox training).**

Refreshing the content of our established system for supply chain verification so that all onboarding records are held centrally are updated by end of 24 and a review process is established.

**(KPI: 100% of top 100 most frequently used suppliers, to be verified by end of 2024).**

# 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 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 which facilitates our awareness programme for all 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 Supply Chain 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.

This code is also available on our supplier microsite and referenced in our standard terms and conditions.

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 Working hours policy details procedures in place to monitor compliance with the Working Time Regulations.

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.

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## Policies related to this Statement:

G20 Modern Slavery  
F05 Sustainable Ethical Procurement  
G07 Sustainability  
G09 Ethics  
Code of Conduct  
HR09 Equality Diversity & Inclusion  
Supply Chain Code of Conduct





If you have any questions regarding the  
Modern Slavery Statement please contact:

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