



## **Modern Slavery and Human Trafficking Statement 2022/2023**

More than 250 years since the end of the transatlantic slave trade, there are nearly 50million\* people trapped in some form of slavery worldwide today (\*International Labour Organisation 2022). Modern slavery and human trafficking are heinous forms of organised crime in which people are treated as commodities and exploited for criminal gain.

Tideway has zero tolerance to all forms of exploitation, whether it be enslavement, people trafficking, racial intolerance, gender or disability inequality. Our **Modern Slavery and Human Trafficking Statement** sets out the steps the company is taking to ensure the Project and its supply chain adheres to all relevant legislation and that our employment practices are fair, open and above board.

### **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, and is known as, Tideway. Tideway is owned by a consortium of investors that comprises Allianz, Amber Infrastructure, and Dalmore Capital.

Tideway has its headquarters and operates solely in the United Kingdom and together with its Programme Manager Jacobs, Tideway currently has around 300 employees. The Thames Tideway project (the Project) is being delivered under three separate construction contracts by three joint venture construction partners Our supply chain includes these joint venture consortiums: Bam Nuttall Ltd, Morgan Sindall PLC, Balfour Beatty Group (BMB), Ferrovial Agroman UK Ltd, Laing O'Rourke Construction (FLO), Costain Ltd, Vinci Construction Grands Projects and Bachy Soletanche (CVB) – together with Amey OWR Ltd who are providing systems integration services.

### **Tideway's Stance on Modern Slavery and Human Trafficking**

Tideway is committed to ensuring that there are no instances of modern slavery or human trafficking 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 modern slavery and human trafficking is not taking place anywhere in the Project.

Tideway strive for a sector-leading approach to modern slavery with appropriate and well communicated corporate policies, and a due diligence programme based on supply chain risk assessment. Tideway have implemented training across the organisation and work with key suppliers to mitigate the risk of modern slavery within our supply chain.

## **Tideway's processes and procedures to minimise the risk of Modern Slavery and Human Trafficking**

Tideway has developed a range of commitments that supports ethical practices in the supply chain. These include paying the London Living Wage (LLW), paying SMEs within 30 days of invoice, providing job security by working under contracts and ensuring that 100 per cent of our key building materials (cement, aggregates, steel) must be certified to either BES6001 Responsible Sourcing of Construction Products, CARES Sustainable Constructional Steel (SCS) or Eco-Reinforcement as applicable. All timber being used on site must be certified as FSC and/or PEFC standard. Our processes and procedures include:

### **1) Supplier adherence to our values**

Tideway have high expectations of our business partners, subcontractors and suppliers. All new suppliers are required to comply with our Honest and Ethical procurement policy, and Tideway expect them to demonstrate a zero tolerance to any form of modern slavery and human trafficking. To this end we have in place a compliance programme which requires the joint venture consortiums to ensure they are compliant with the Modern Slavery Act 2015 and to provide confirmation of that each year.

Tideway and our joint venture consortiums comply with the ILO's Ethical Trading Initiative (ETI) and we require that all of our suppliers adhere to the ETI base code which sets out 9 minimum principles in relation to labour

### **2) Due Diligence Processes for Modern Slavery and Human Trafficking**

Practices that come within the ambit of Modern Slavery are numerous, complex and hidden. As part of our initiative to mitigate the risk of modern slavery and human trafficking in our supply chains, we have in place systems to:

- Identify and assess potential risk areas;
- Monitor those potential risk areas; and
- Protect whistle-blowers with our anonymous hotline

We routinely undertake our own risk assessment of Modern Slavery in our supply chain. We have developed a supply chain risk assessment process to support this (using methodology based on the Global Slavery Index - <https://www.globalslaveryindex.org>)

### **3) Right to Work**

Tideway 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. We work with our joint venture partners and supply chain to ensure that this is the case for all their personnel working on the Project. Tideway's Onboarding process includes an automated red flag raising system which identifies employees of Tideway, and employees of our Main Works Contractors and subcontractors, who do not have the right work in the UK, who may not be earning the London Living Wage, or whose domestic or travel arrangements appear unusual, and require further investigation. No one can gain access to work on our sites without going through this onboarding process, and all employees who work full time on Tideway must be paid the London Living Wage or agreed equivalent in the case of young people and apprentices.

#### **4) Policies and Training**

Tideway have the following policies which employees are required to read and comply with while working on the Project:

- Honest and Ethical Behaviour policy;
- Whistle-Blowing Policy – supported by the anonymous whistleblowing hotline;
- Anti-Fraud, Corruption and Bribery Policy;
- Anti-Money Laundering Policy;
- Grievance Policy; and
- Bullying and Harassment Policy

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the business and in the supply chain, we provide mandatory, online Modern Slavery training for all staff during their induction process. The training is supplemented throughout the year with additional short courses, awareness events, talks and refresher training.

#### **5) Modern Slavery and Ethical Procurement Working Group**

In June 2020 Tideway launched the Modern Slavery and Ethical Procurement Working Group (MSEPWG) with participants from across our supply chain. The MSEPWG meet on a periodic basis and provides strategic support and challenge on the approach by the participants to mitigating risks of unethical labour supply and procurement practices (including goods & materials) on Tideway.

#### **External Memberships**

##### **Gangmasters and Labour Abuse Authority (GLAA)**

Tideway has signed the GLAA Construction Protocol. This joint agreement between some of the biggest names in UK construction is aimed at eradicating slavery and labour exploitation in the construction and property industry. The protocol allows signatories to work in partnership to protect vulnerable workers, to share information and to commit to raising awareness in the supply chain.

##### **Bright Future**

In 2022 we joined a cooperative called Bright Future which is a fast-tracked supported employment programme for survivors of Modern Slavery. Charities work with survivors to get them work ready and business provide employment and continued support. We facilitated a face-to-face summit for members to discuss how all the members can provide jobs in the right areas and regions to support more survivors into secure employment.

## Approval

This statement (approved by the BTL Board) is made pursuant to section 54 (i) of the Modern Slavery Act 2015 and constitutes Tideway's Modern Slavery and Human Trafficking Statement for the financial year ending 31st March 2023.

Signed



---

Andy Mitchell CBE, FREng  
Chief Executive Officer, Tideway



---

Sir Neville Simms FREng  
Chairman, Tideway