



Modern Slavery Statement – Tideway

An Introduction to Tideway's Statement on Modern Slavery and Human Trafficking 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, racial intolerance or gender inequality. Our **Modern Slavery Statement** sets out the steps the company has taken to ensure the 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 first Modern Slavery Statement which will be reviewed and updated on an annual basis.



Andy Mitchell CBE FREng

Chief Executive Officer - Tideway



Modern Slavery and Human Trafficking

A Statement on Behalf of Tideway

Modern slavery and human trafficking are atrocious forms of organised crime in which people are treated as commodities and exploited for criminal gain. The International Labour Organisation 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.

Tideway is committed to improving our practices to combat modern slavery and human trafficking.

The Structure of the Organisation

Bazelgette 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.

With more than 400 employees and contractors, Tideway has its headquarters and operates solely in the United Kingdom. The Thames Tideway project (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 Blackfriars and Tideway East, constructing the tunnel between Bermondsey and Stratford.

The construction companies that comprise our supply chain include: Bam Nuttall Ltd, Morgan Sindall PLC, Balfour Beatty Group, Ferrovial Agroman UK Ltd, Laing O'Rourke Construction, Costain Ltd, Vinci Construction Grands Projets, Bachy Soletanche and Amey – these are the joint venture consortiums contracted to build the tunnel.

Tideway's Stance on Modern Slavery and Human Trafficking

Tideway is obligated to ensure 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.

Supplier Adherence to Our Values

Tideway has zero tolerance towards any form of modern slavery and human trafficking. To ensure all those in our supply chain and our 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 Modern Slavery Act 2015 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.

Due Diligence Processes for Modern Slavery and Human Trafficking

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

- I. Comply with the Ethical Trading initiative
- II. Identify and assess potential risk areas to our supply chains
- III. Mitigate the risk of modern slavery and human trafficking in our supply chains
- IV. Monitor potential risk areas in our supply chains
- V. Protect whistle-blowers

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.

Policies and Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains we provide training to our staff during their induction process. We also have the following policies in place:

- Honest and Ethical Behaviours Policy
- Equal Opportunities Policy
- Whistle-Blowing Policy
- Anti-Fraud, Corruption and Bribery Policy
- Anti-Money Laundering Policy
- Grievance Policy

- Bullying and Harassment Policy

This statement 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 31 March 2017.