



ETI Corporate Transparency Framework

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For the purpose of this statement, we will provide information for each of the base codes in turn.

1.1 Base Code 1 – Employment is freely chosen – WGC have a standard recruitment process that meets all legal and ethical requirements. Each employee has the responsibility of completing their own starter pack information which includes submitting their own bank account details. This is uploaded to the I-Trent payroll system, which would immediately identify if a bank account was being used by another employee and would be automatically rejected. The system would also reject a starter pack if a duplicate email was provided by more than one employee. During this onboarding process, all Right to Work documentation will be checked and verified prior to any employment being commenced. Each location would have a poster regarding Modern Day Slavery and a confidential email address to be able to report any concerns.

Base Code 2 – Freedom of Association and the right to collective bargaining are respected – All employees have the right to join or form Trade Unions of their own choosing. WGC Limited has a very close relationship with Unite the Union as evidenced by supporting our new Ukrainian staff with ESOL classes, free of charge. WGC currently have 761 Ukrainian employees who have been recruited since March 2022. WGC welcome Trade Union representation at disciplinary and grievance meetings. WGC work closely with Unite the Union on Health and Safety initiatives in the housekeeping sector.

Base Code 3 – Working conditions are safe and hygienic – All WGC staff work on client’s premises, and we ensure that the conditions on these sites provide a safe and hygienic working environment for our team members. All employee’s complete induction training prior to commencing work. Risk Assessments are completed as part of our return-to-work process, following periods of sickness if applicable. They are also conducted for all pregnant employees at various stages of their pregnancy. If a team member discloses a disability, a risk assessment would be carried out and reasonable adjustments made. WGC have a Health and Safety Committee that monitor and review all Health and Safety standards and procedures. This committee is led by a Health and Safety Director.

Base Code 4 – Child labour shall not be used – WGC adhere strictly to all regulations regarding the employment of any team member or any employee under the age of 18. Additional supervision and longer breaks as per the regulations are implemented at each hotel. Young people’s Risk Assessments are carried out prior to employment. All young people are paid the same rate of pay as all other team members and not at a reduced rate.

Base Code 5 – Living wages are paid – All rates of pay have been increased to that higher than the National Living Wage across WGC. All employees automatically receive their contract of employment on day one, when their new starter pack is completed. Any deduction from wages is included in the contract of employment.



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Base Code 6 – Working hours are not excessive – All employees have the opportunity to agree to the Working Time Directive. If they wish to work above 48 hours per week, they have to request to opt out of the agreement. An excessive hour's report is sent to all senior management team on a monthly basis, any concerns would be raised and investigated. Employees have to sign in and out themselves to ensure that they are paid for every hour they have worked. Payroll audits are carried out regularly at every location to verify compliance.

Base Code 7 – No discrimination is practiced – Equality, Diversity and Inclusion is a priority for WGC. It is an essential part of the onboarding process for all employees. Training takes place on a regular basis to reinforce our policy and procedures. The HR contact details are visible at each WGC location and employees are encouraged to raise any concerns. Any concerns raised would be investigated immediately and appropriate action taken.

Base Code 8 – Regular employment is provided – All new employees have the opportunity to choose the number of contracted hours they wish to work to fit their personal circumstances. A report is produced every month from the payroll department to the senior management team for any employees that have not had hours worked during that period. All employees are employed on a permanent contract to ensure regular employment is provided.

Base Code 9 – No harsh or inhumane treatment is allowed – If any concerns were raised by employees regarding physical, sexual, harassment or bullying, these would be dealt with as a priority and investigated thoroughly. WGC has zero tolerance for any physical, sexual, harassment or bullying or any other form of intimidation.

1.2 – The HR Director takes responsibility for ensuring compliance with Governance and accountability areas regarding our ethical trade standards. There is a monthly senior team meeting attended by the CEO where any issues or concerns would be raised. The Board of Directors hold 3-monthly meetings and our ETI commitments would be discussed and approved.

1.3 - WGC does not have supply chains. However, we do have a variety of clients and we are finding that increasingly, they are looking to work with ethical suppliers. When we bid for a new contract or an expiring contract that is going out to tender, WGC have to be able to demonstrate their ethical processes and practices. WGC have regular audits by our clients where we are able to evidence that we meet all the above base code requirements. WGC have to provide Right to Work documentation, payslips evidencing paying at or above the National Minimum Wage and individuals contracts of employment.

1.4 – WGC is in a unique situation which does not have any supply chains within the business.



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1.5 - All employees have the right to join or form Trade Unions of their own choosing. WGC Limited has a very close relationship with Unite the Union as evidenced by supporting our new Ukrainian staff with ESOL classes free of charge. WGC currently have 761 Ukrainian staff who have been recruited since March 2022. WGC welcome Trade Union representation at disciplinary and grievance meetings. WGC work closely with Unite the Union on Health and Safety initiatives in the housekeeping sector.

1.6 – WGC work with different cultural behaviours which could lead to discrimination between colleagues. WGC conduct robust Equality and Diversity training and support. (Making sure all staff have Equality and Diversity training) for all staff and detailed training for management. WGC identify the risks of sexual harassment and verbal abuse by its clients' guests. WGC work closely with their clients to ensure that guests are asked to leave and do not return. WGC had a positive process to ensuring that people fleeing the Ukraine were offered roles within WGC. Our priority was to ensure their welfare whilst working for WGC. To ensure this, WGC set up a support team of Ukrainian speakers to offer welfare and unique onboarding process for these employees.