

Slavery and Human Trafficking Statement 2020

INTRODUCTION

This Slavery and Human Trafficking Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 ("the Act") relating to Transparency in Supply Chains.

Amey UK plc ("Amey") recognises that it has a responsibility to take a robust approach to slavery and human trafficking and indeed takes a zero-tolerance approach to non-compliance with the Act in any part of its business or its supply chain.

This is the fifth such statement Amey has made pursuant to the Act and sets out the steps Amey has continued to take to address the risk of slavery and human trafficking within its operations and supply chain.

ORGANISATIONAL STRUCTURE

Amey via its subsidiaries and joint venture partners is a provider of a wide variety of services operating predominantly in these sectors consulting, rail, highways, facilities management, defence, utilities, waste collection and energy from waste.

Amey is part of the Ferrovial Group and its ultimate parent company is Ferrovial SA which has its headquarters in Spain.

Amey is the ultimate UK parent company of the Amey group of companies (the "Amey Group"). The Amey Group has over 14,000 employees worldwide and operates mainly in the UK. Its head office is in London.

OUR BUSINESS

Amey's business is organised into five business units:

- Consulting – providing consulting and analytics capabilities at the core of Amey's offering
- Transport Infrastructure – with a focus on the highways and regulated rail market also including waste collection
- Secure Infrastructure – providing comprehensive hard and soft facilities management services to the Defence, Justice and Local Authority sectors

- Waste Treatment – development and management of strategic waste recycling facilities across England
- Utilities – undertaking repairs and maintenance and capital works across the UK water and power sector

The five business units draw on support centrally in respect of health and safety and the environment, legal, human resources, procurement, property, IT, finance and social value.

Amey also operates in joint venture with strategic partners in many areas of its business. For the purposes of the Act, joint ventures are not necessarily treated as part of our supply chain. Each joint venture will set its own policy and will draw on relevant parent company policies as directed.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

Amey remains committed to ensuring that there is no modern slavery or human trafficking in its supply chain or in any part of its business with a zero tolerance for non-compliance.

This statement reflects that commitment to acting ethically and with integrity in all the Amey Group's business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the supply chains.

Amey operates under a number of policies, which ensure business is conducted to the highest ethical standard including:

- The Amey Code, which covers a range of ethical and conduct related policies
- Sustainable Procurement and Supply Chain Policy Statement
- Recruitment & Selection Policy
- Inclusion Policy
- Safeguarding Policy
- Health and Safety Policy
- Social Value Policy

- Dignity at Work Policy
- Wellbeing Policy

Amey has an effective grievance and whistle blowing process and policy in place to manage any concerns within the business or the supply chain. All new Amey employees are provided with, and have access to, a copy of the mandatory Amey Code which was circulated to all employees during the year. Information on this is also included as part of the employee onboarding process.

OUR SUPPLY CHAINS

Amey's supply chains include:

- Plant, vehicles and equipment suppliers
- Subcontractors and various service providers
- Suppliers of contingent labour
- Manufacturers and suppliers of goods and materials

All procurement of services and supplies is undertaken by professional procurement specialists within either the central procurement function or within the business units. Amey's intention is to build and maintain long term sustainable relationships with its suppliers encouraging collaborative working and exchange of innovative and good industry practices.

As part of the supply chain process, Amey has a number of systems to:

- Evaluate new suppliers as part of the on-boarding process
- Identify and assess potential risk areas in our supply chains and
- Monitor potential risk areas in our supply chains

The Amey Group's supply chain includes approximately 5,700 suppliers of varying size and expertise and in 2020 the Amey Group paid approximately £1.6bn to its supply chain.

Amey assesses compliance within its existing supply chain and will assess any new suppliers for compliance with the following criteria:

- No forced labour or human trafficking is practiced, and employment is freely chosen
- Working conditions are safe and hygienic
- Working hours are not excessive
- A fair wage is paid
- No child will be exploited
- No harsh, cruel or degrading practices are allowed
- No discrimination is practised

A failure to comply with the above is an absolute bar to pre-qualification as a supplier to the Amey Group.

SUPPLIER ADHERENCE TO OUR VALUES

During 2020 Amey continued to engage with its supply chain extending communications on its values and specifically around the Act. Failure to respond to any enquiries carries consequences for those within the supply chain.

As part of Amey's online onboarding process suppliers are assessed individually on their perceived risk to Modern Slavery. In 2020 the Amey Group renewed its supply chain Modern Slavery risk mapping assessment and is now reviewing the progression of those actions. The review involved a category specific approach, assessing both the risk of Modern Slavery occurring and the strategic risk to Amey with the emphasis on those categories considered most at risk.

RECRUITMENT & TRAINING

The Amey Group undertakes pre-employment screening that includes identity checks and confirmation of entitlement to work in the UK on all employees prior to commencing employment with the Amey Group. These checks have extended in 2020 to a regular on-going review of bank account, next of kin and home address duplications, as potential indicators of Modern Slavery. Where duplications are identified these are followed up by our HR team and line managers.

As part of the onboarding process for joining the Amey Group each employee is given an overview of the essential policies and information in relation to those policies, procedures and other matters such as whistle blowing.

Building on the training to procurement teams last year, the Amey Group continues to use its web-based training, accessible to its employees. The online training portal was refreshed in 2020 with governance training now being cascaded through this portal on an annual basis. We have also developed a centralised dashboard to provide visibility to our managers on employee training completion. For off-line employees we have produced a training and briefing for cascading by supervisors, along with posters and communications materials on what to do, if you have a concern.

KEY PERFORMANCE INDICATORS (KPIs)

Amey's measures to combat Modern Slavery are in constant review and the pro-active regime of training and internal and external audits shall continue and will be stepped up to maintain compliance.

The main KPIs for ensuring the effectiveness that slavery and human trafficking is not taking place includes:

- Number of potential incidents raised
- Employee completion of Modern Slavery training
- Completion of internal employee data checks
- Number of supply chain audits and completion of follow up actions

- Number of audits on Amey and completion of follow up actions

During 2020 no incidents on Modern Slavery were raised through any of the channels provided.

INDUSTRY ENGAGEMENT

In 2020 Amey became signatories to the Gangmaster and Labour Abuse Authority's Construction Protocol. The protocol commits signatories to:

- Work in partnership to protect vulnerable workers
- Agree to share information, where possible, to help stop or prevent the exploitation of workers
- Work together to manage information sensitively and confidentially
- Commit to raising awareness within the supply chain
- Maintain momentum through this protocol by communicating regularly

In September, Amey was asked by the Cabinet Office to present its approach and action plan to reduce the risk of Modern Slavery across the organisation. This session aimed to increase awareness and explore the key steps that commercial and procurement staff across government should take to eliminate Modern Slavery from government supply chains, with over 100 people attending.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Amey's slavery and human trafficking statement for the financial year ending 31 December 2020.

This statement applies to Amey UK plc and all of its subsidiary companies. The statement has also been approved by the Boards of Directors of the following group companies on today's date:

- Amey plc
- Amey Community Limited
- Amey Defence Services Limited
- Amey Defence Services (Housing) Limited
- Amey Fleet Services Limited
- Amey Group Services Limited
- Amey Highways Limited
- Amey LG Limited
- Amey OW Limited
- Amey OWR Limited
- Amey Rail Limited
- Amey Services Limited
- Amey Holdings Limited
- Amey Power Services Limited
- Amey Utility Services Limited
- AmeyCespa (East) Limited
- Byzak Limited
- Enterprise AOL Limited
- Enterprise Managed Services Limited



Amanda Fisher
Chief Executive

SIGNED: 9TH FEBRUARY 2021

