

AMEY UK PLC

SLAVERY AND HUMAN TRAFFICKING STATEMENT

FINANCIAL YEAR ENDING 31 DECEMBER 2019

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 fourth 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 our 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 Group has over 17,000 employees worldwide and operates mainly in the UK but also has offices in Australia and the USA. Its head office is in London.

OUR BUSINESS

Our 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 and finance.

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 SUPPLY CHAINS

Our 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. We aim to build long term sustainable relationships with our suppliers encouraging collaborative working and exchange of innovative and good industry practices.

We have in place systems to:

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

Our supply chain includes approximately 5700 suppliers of varying size and expertise and in 2019 we paid approximately £1.9bn to our supply chain.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

We remain committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business with a zero tolerance for non-compliance.

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

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

- Code of Ethics and Conduct
- Sustainable Procurement and Supply Chain Policy Statement
- Recruitment Policy
- Inclusion Policy
- Safeguarding Policy
- Health and Safety Policy
- Social Value Policy

Amey has an effective grievance and whistle blowing process in place to cover 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 Code of Ethics and Conduct – information on this is also included in the Employee Induction.

Amey assess 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 labour is 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.

SUPPLIER ADHERENCE TO OUR VALUES

During 2019 we continued to engage with our supply chain extending communications on our values and specifically around the Act. Failure to respond to our enquiries carries consequences for those within the supply chain.

As part of our online onboarding process suppliers are assessed individually on their perceived risk to Modern Slavery. Suppliers deemed medium to high risk have been contacted and evaluated on their understanding of the legislation. Where lack of understanding is evident further action has been taken to either train the supplier on the legislation or remove them as a supplier to Amey. In 2019 we renewed our supply chain Modern Slavery risk assessment and are now reviewing the onward actions.

RECRUITMENT & TRAINING

We undertake pre-employment screening that includes identity checks and confirmation of entitlement to work in the UK, on all employees prior to commencing employment with us. On joining each employee shall attend an induction which covers the essential policies and information in relation to policies and procedures and matters such as whistle blowing.

Building on the training to procurement teams last year, we continued to use our web-based training, accessible to our employees via the AmeyWorld intranet site. As part of a 2 year cycle in 2020, this training will be refreshed and cascaded to employees. We have been developed a centralised dashboard to provide visibility to our managers on employee training completion.

KEY PERFORMANCE INDICATORS

Our 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.

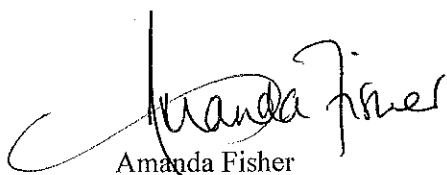
Our main KPI is the number of incidents raised. During 2019 no incidents on Modern Slavery were raised through out any of the channels provided.

In 2019 we completed the Cabinet Office's Modern Slavery Assessment Tool and scored 87%. We are now reviewing and working on the assessment recommendations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019.

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
Enterprise AOL Limited
Enterprise Managed Services Limited



Amanda Fisher
Chief Executive

5th March 2020