

Slavery and Human Trafficking Statement

Financial Year Ending 31 December 2016

1.0 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 statement sets out the steps Amey has taken to address the risk of slavery and human trafficking within its operations and supply chain. This is Amey's first such statement and some of the actions set out below are a work in progress for the forthcoming year. Amey is committed to reviewing and improving its practices to combat slavery and human trafficking in its corporate activities and to ensure that its supply chain is and remains free from slavery and human trafficking.

2.0 Organisational Structure

Amey via its subsidiaries and joint venture partners is a provider of a wide variety of services operating predominantly in the Consulting and Rail, Highways, Facilities Management, Environmental, Utilities and Defence sectors.

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 20,000 employees worldwide and operates mainly in the UK but also has offices in Australia, Qatar and the USA. Its head office is in Oxford.

3.0 Our Business

Our business is organised into five business units:

- Utilities
- Facilities Management and Justice
- Consulting and Rail
- Environmental Services
- Highways

The five business units draw on support centrally in respect of legal, HR, 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.

4.0 Our Supply Chains

Our supply chains include:

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

All procurement of services and supplies is undertaken by trained procurement specialists within either the central procurement function or within the five business units. We aim to build long term sustainable relationships with strategic suppliers encouraging collaborative working and exchange of innovative and good industry practices.

5.0 Our Policy on Slavery and Human Trafficking

We are absolutely 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 operate under the following policies, which ensure business is conducted to the highest ethical standard:

- Code of Ethics
- Procurement Policy
- Recruitment Policy
- Inclusion Policy
- Safeguarding Policy
- Health and Safety Policy
- Ethical Trading Policy

Amey has an effective grievance and whistle blowing process in place to cover any concerns within the business or the supply chain. All Amey employees are provided with a copy of the mandatory Code of Ethics.

6.0 Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we have mobilised a cross functional working group to assess and respond to the requirements of the Act with representatives from corporate social responsibility, legal, company secretariat, compliance, procurement and HR.

Existing policies and practices are being reviewed and updated and standard form contracts updated to ensure compliance. Direct labour risk assessments are being completed for each business unit.

We have carried out a risk based analysis on our own operations and within our supply chain having special regard for the location of those operations and type of service.

We have put 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

As part of the due diligence process we have reviewed our procurement supplier selection process. All suppliers must complete a prequalification evaluation questionnaire and are required to confirm that they comply with the relevant Amey policies before we will do business with them.

We have assessed each of our supply chain categories against the requirements of the Act. Each category has been assigned as high, medium or low risk. As a result of this risk analysis, we have written to suppliers within the high and medium risk categories requesting them to complete a survey as evidence of their commitment to and compliance with the Act.

In addition, all suppliers with a turnover of in excess of £36m have been required to provide further information, including copies of relevant policies and their own slavery and human trafficking statement. Strategic suppliers have been asked to attend a presentation on the Act at a corporate strategic supplier event.

Amey periodically reassess 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 will be an absolute bar to pre-qualification as a supplier.

7.0 Supplier Adherence to our Values

Amey's supply chain audit regime has been extended to incorporate compliance with the Act. Our compliance team consists of representatives from the following departments:

- Procurement
- Audit and compliance
- Human resources

8.0 Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain members of our procurement team have all been briefed on the Act.

Commencing early in 2017 we will be providing web-based training to a wider group of staff who are likely to be in a position to identify and address potential modern slavery risks. This category includes all people managers and HR representatives in addition to the procurement teams.

9.0 Further Steps

The actions above are a continuous process and following a review of the effectiveness of these measures will be further developed and the regime of internal and external audits will be stepped up to maintain compliance and to ensure that the initiative remains focussed.

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 2016.



A handwritten signature in black ink that reads "Andy." with a horizontal line underneath.

Andy Milner
Chief Executive Officer