## AMEY UK PLC

## SLAVERY AND HUMAN TRAFFICKING STATEMENT

## FINANCIAL YEAR ENDING 31 DECEMBER 2018

# 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 third 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 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 19,000 employees worldwide and operates mainly in the UK but also has offices in Australia and the USA. Its head office is in Oxford.

### **OUR BUSINESS**

Our business is organised into five business units:

- Utilities
- · Facilities Management and Justice
- · Consulting and Rail
- Environmental Treatment
- Highways

The five business units draw on support centrally in respect of health and safety and the environment, 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.

# **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 5000 suppliers of varying size and expertise and in 2018 we paid approximately £1.7bn 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 the following policies, which ensure business is conducted to the highest ethical standard:

- Code of Ethics
- Business Ethics Policy
- Sustainable Procurement and Supply Chain Policy Statement
- Recruitment Policy
- Inclusion Policy
- Safeguarding Policy
- Health and Safety 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 a copy of the mandatory Code of Ethics.

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 2018 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 and we have discontinued business with a number of suppliers due to their lack of proactivity as to the Act and/or lack of progress or desire in demonstrating their position in a transparent and collaborative ethos.

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. Further risk analysis is ongoing as part of our management system to ensure compliance and alignment to Amey Values.

### **RECRUITMENT & TRAINING**

Amey employs around 19,000 employees within the UK. 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 have developed web-based training accessible to our employees via the AmeyWorld intranet site During 2019 this training will be further cascaded to all employees.

#### **FURTHER STEPS**

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.

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 2018.

Andy Milner Chief Executive

This statement applies to Amey UK plc and all of its subsidiary companies.

The statement has 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

18th March 2019