

Anti-slavery and Human Trafficking Policy

About this policy

The purpose of this policy is to set out our responsibilities in observing and upholding our position on modern slavery and human trafficking and to provide information on how to identify and report concerns regarding modern slavery and human trafficking.

This policy applies to all individuals working at all levels and grades, including (but not limited to) senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, temporary staff, volunteers, interns, agents, sponsors or any other person associated with Amey (collectively referred to as “employees” in this policy).

This policy shall also be complied with by all Amey controlled joint ventures, advisers and agents and all suppliers and sub-contractors used by Amey. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Principle

Modern slavery is a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Amey commit to fulfil all compliance obligations regarding human rights within the jurisdictions that we operate alongside the principles set out in this policy.

We have a zero-tolerance approach to modern slavery. We are committed to:

- acting ethically and with integrity in all of our business dealings and relationships;
- training those that work on behalf of Amey to spot the signs, and use appropriate escalation channels to raise concerns;
- implementing and enforcing effective and proportionate systems and controls to reduce the risk of modern slavery taking place anywhere in our own business or in any of our supply chains; and
- ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations across the jurisdictions we operate.

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Whilst recognising our commitment to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place within our own organisation or in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains.

To underpin our compliance with practical steps, we implement the following measures:

- conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- engage with our suppliers both to convey to them our Anti-Slavery and Human Trafficking Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and their supply chain;
- complete supplier pre-screening and self-reporting for our suppliers on safeguarding controls; and
- introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

How to raise a concern

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you suspect someone is in immediate danger the designated whistleblowing channel (in the UK, this is the Amey Whistleblowing Helpline on 0800 047 4037 and in the Republic of Ireland it is 1800 262 637). They may advise you make an additional call direct to the police (in the UK 999).

If you are unsure whether something you have seen or been told about could be a form of modern slavery — including how workers are treated or their working conditions at any level of our supply chain — you must report it as soon as possible through the designated whistleblowing channel.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Training and communication

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, must form part of the induction process for all individuals who work for us. Modern Slavery training is mandated for all employees and must be repeated every two years.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

Breaches of this policy

If you believe or suspect that a breach of this policy has occurred or that it may occur you must report it as soon as possible via the designated whistleblowing channel (in the UK this is the Amey Whistleblowing Helpline - 0800 047 4037).

If an issue is identified with a supplier, where appropriate we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Responsibilities

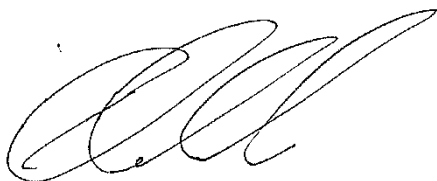
The overall responsibility for this policy lies with the Chief Executive Officer.

The Modern Slavery Working Group has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains

This policy should be read in conjunction with the following policies:

- Amey Whistleblowing Policy and procedure
- Amey Safeguarding Policy & arrangements

**Andrew Milner**

Chief Executive Officer

For and on behalf of the Board

Revision status

REVISION	DATE	AMENDMENT	CONTENT OWNER	MANDATED BY
1.0	24/01/2023	Issue for use	ESG Director	CEO
2.0	18/01/2024	Annual review and re-brand	ESG Director	CEO
3.0	16/01/2025	Annual review	ESG Director	CEO
4.0	22/04/2026	Annual review	ESG Director	CEO