

Slavery and Human Trafficking Statement 2025

Amey is committed to reducing the risk of modern slavery or human trafficking occurring in its supply chain or in any part of its business with a zero-tolerance approach to non-compliance.

This is supported by our Anti-Slavery and Human Trafficking Policy.

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 Limited (“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 tenth 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 and justice.

Amey’s investors are Buckthorn Partners LLP (“Buckthorn”) and One Equity Partners (“OEP”).

Amey is the UK parent company of the Amey group of companies (the “Amey Group”). The Amey Group has over 11,000 employees worldwide and operates mainly in the UK. Its head office is in London.

Our business

Amey’s business is organised into three 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
- Complex Facilities – providing comprehensive facilities management services to Defence, Justice and broader public estates

(collectively “the Business Units”)

The Business Units draw on support centrally in respect of health, safety, environment, legal, human resources, procurement, property, IT, finance and ESG.

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 is structured, governed and operated to align with Amey’s policies and may create their own policy from time to time.

Our Values and Amey Code

At Amey, we are driven by a strong set of shared values, based on safety, insight and collaboration. The five key values by which we operate:

1. We put safety first
2. We bring the best
3. We win as one
4. We are inspired by insight
5. We look after each other

The Amey Code builds on our values and sets out our commitment to act with integrity in everything that we do. It provides a common framework around how we are expected to behave and signposts to all our corporate policies. The Amey Code applies to every single permanent, temporary and agency employee, as well as individuals engaged by our subsidiaries and suppliers.

Everyone who works for and with Amey is expected to ensure that:

- We treat everyone with respect
- We conduct our business responsibly and with integrity
- We do not misuse property or information

In 2025 we refreshed and updated the Amey Code and communicated this to all employees. All Amey employees are provided with, and have access to, a copy of the mandatory Amey Code and are required to complete mandatory training.

Our governance for modern slavery

The Amey Executive Committee has overall responsibility of our approach to modern slavery.

Each year Amey creates an Action Plan to help continuously improve the approach to reducing the risk of modern slavery occurring within our operations and our supply chain.

We have established a Modern Slavery Working Group to review our approach to Modern Slavery, co-ordinate the delivery of the Action Plan and draft the annual statement. The Modern Slavery Working Group meets on a quarterly basis and involves representatives from social value, procurement, people and legal. The Modern Slavery Working Group is accountable to the Amey Board's ESG Committee and Executive Committee and it has a primary day-to-day responsibility for implementing Amey's Anti-Slavery and Human Trafficking Policy.

Our policy on slavery and human trafficking

Amey remains committed to reducing the risk of modern slavery or human trafficking occurring in its supply chain or in any part of its business with a zero-tolerance approach to non-compliance. This is supported by our [Anti-Slavery and Human Trafficking Policy](#).

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 reduce the risk of slavery and human trafficking in our supply chains.

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

- Anti-Slavery and Human Trafficking Policy
- Sustainable Procurement and Supply Chain Policy
- Recruitment & Selection Policy
- Inclusion Policy
- Safeguarding Policy
- Health and Safety Policy
- Social Value Policy
- Dignity at Work Policy
- Wellbeing Policy
- Business Ethics Policy
- Policy on Compliance with UK and European Competition Law

- Whistleblowing Policy

Amey has an effective grievance and whistleblowing process and policy in place to manage and investigate any concerns within the business or the supply chain.

Recruitment, checks and training

Amey 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 include a regular ongoing 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 People team.

As part of the onboarding process for joining Amey, each employee is given an overview of the essential policies and information in relation to those policies, procedures and other matters such as whistleblowing. All employees are required to complete regular training modules on key topics such as modern slavery, these are assigned to new employees upon enrolment and every two years thereafter.

In 2025, Amey continued to conduct ongoing internal audits encompassing employee personal data, including bank account details, next-of-kin information, and home addresses for all employees. The aim is to identify potential indicators of modern slavery within the organisation, of which none have been found.

Amey continues to use its web-based training accessible to its online employees. 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 they have a concern.

Amey partners with Health Assured to run and operate a Whistleblowing Helpline to proactively encourage the reporting of concerns of malpractice or wrongdoing. In the event of a potential modern slavery incident, we have a process in place to escalate and respond. Suitably trained investigators are appointed to the investigation, which remains on a need-to-know basis. If the investigator believes it is a potential incident of modern slavery, they will inform the relevant authorities immediately and support is offered to any potential victims in line with the Anti-Slavery and Human Trafficking Policy.

Amey recognises the importance of raising awareness of domestic abuse which can be linked to modern slavery and as an issue can affect anyone, with one in three women and one in six men experiencing domestic abuse in their lifetime. Amey are active members of the Domestic Abuse Employers Initiative, and in 2025 continued to raise awareness of what it is, and what to do if either they or a colleague are experiencing it. We also have a network of Domestic abuse ambassadors who have been trained in trauma informed response.

We have now appointed five Anti Modern Slavery Ambassadors, who act as local champions to embed awareness, promote good practice and support early escalation of concerns. Their details are published on our Intranet to improve visibility and accessibility for colleagues seeking support or guidance.

During the period, we continued to strengthen awareness and capability across the organisation through targeted modern slavery training. Two dedicated training sessions were delivered, attended by colleagues from recruitment, onboarding, people services and our Modern Slavery Ambassador network. These sessions generated strong engagement, reinforcing understanding of risk indicators, reporting routes and the critical role our people play in prevention. The session was recorded and will be issued to future new starters, with plans to develop a permanent version for our learning management system to ensure consistent, high quality learning is accessible across the organisation.

Our supply chain

Engagement and partnership with our suppliers is fundamental to our work at Amey. The Amey Group's supply chain includes approximately 5,400 suppliers of varying size and expertise and in 2025, with a direct spend of £1.16bn. On average Amey paid 99% of invoices within 60 days.

In 2025 we published a new 'Working with our Suppliers' guide that aimed to set out the specific commitment Amey makes to its suppliers and the expectation Amey requires from them. Business ethics and integrity, human rights and modern slavery formed a key element of the guide. The guide emphasises that failure to respond to any enquiries from Amey carries consequence for those within the supply chain, ultimately including exclusion as a supplier.

Amey's supply chain 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 are 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. To strengthen our strategic supplier partnerships we commenced co-developing Supply Chain Charters, that set out the specific goals and commitments they will partner with us on.

In June 2025, Amey received the Chartered Institute of Purchasing and Supply Award for Excellence in Procurement. The award serves as a benchmark of excellence in procurement, recognising organisations that demonstrate the highest professional standards in procurement whilst demonstrating outstanding performance, innovation, and impact in procurement and supply chain management.

Supply chain risk and due diligence

In 2025, the Modern Slavery Working Group set out steps to strengthen its processes to identify and assess supply chain modern slavery risk.

The risk assessment takes a category specific approach, assessing sector vulnerability, supply chain complexity, use of sub-contacting or temporary labour, regulatory oversight and known incidents or reports to provide a risk on the scale very low to very high as summarised in the table below.

Risk (pre mitigation and diligence)	% of total supply chain spend
Very Low	9%
Low	11%
Medium	19%
High	35%
Very High	26%

The outputs of the risk assessment inform where Amey targets onward due diligence and auditing.

The following procurement categories are considered to be of 'very high' risk of modern slavery occurring, prior to any mitigation or due diligence:

- Catering Service
- Cleaning Consumables
- Cleaning Service
- Courier/Freight Service
- Furniture, Fittings and Equipment
- General Builders
- Haulage Service
- IT Consumables
- IT Equipment
- Personal Protective Equipment
- Rail Labour
- Removals Service
- Scaffolding
- Security & Front Office Services
- Telecom Mobiles
- Temporary Labour
- Tools and Equipment
- Traffic Management - Services
- Travel
- Vegetation Management / Soft Estates
- Waste & Recycling
- Window Cleaning Service

Our procurement approach, evaluation and onboarding processes aim to mitigate risk in these, and all procurement categories. Our category approach means that wherever possible we contract with preferred suppliers to focus our spend, reducing the number of suppliers used and facilitating closer supplier relationships supported by our Supply Chain Excellence programme.

As part of the supply chain process and to help mitigation Modern Slavery risk, Amey's systems:

- 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.

Amey continues to use the Constructionline platform for the identification and prequalification assessment of its sub-contractors to a common industry standard. The assessment includes questions specifically related to modern slavery with the requirement, where relevant, to provide a copy of their statement and information to show where the risk of slavery is and that it is being managed correctly.

For plant, vehicles and equipment suppliers, manufacturers and suppliers of goods and materials our procurement category leads work with our preferred suppliers to review the risk and ensure suitable mitigation is in place.

Key Performance Indicators (KPIs)

Amey's measures to reduce the risk of modern slavery are in constant review and the pro-active regime of training and diligence has continued throughout 2025.

The main KPIs for ensuring the effectiveness of reducing the risk of slavery and human trafficking include:

- Actual incidents raised during 2025: 0
- Potential incidents raised during 2025: 2 potential incidents were raised and investigated.
- Training completion: 73% of our employees have completed our modern slavery training,
- Training feedback (average scores): 4.45 (out of 5)
 - *'Everything was clearly explained'*: 4.6 (out of 5)
 - *'Better understanding after completing the course'*: Score 4.3 (out of 5)
 - *'Content was interactive and engaging'*: Score 4.4 (out of 5)
 - *'Course pages were easy to navigate'*: Score 4.5 (out of 5)

- Completion of screening for duplications in employee data as a potential indicator of modern slavery (next of kin, bank details, bank addresses): 100% complete
- Percentage of sub-contractors using Constructionline: 92%
- Government's Modern Slavery Assessment Tool score: 97%

Industry engagement

In 2025 Amey actively participated in the Modern Slavery Steering Committee and Modern Slavery Council, coordinated by the Business Services Association. The aim is to work collaboratively across the sector, providing tools and support to ensure collectively we reduce the risk of modern slavery.

Amey also participates in the Supply Chain Sustainability School Built Environment Against Slavery Working Group, with the aim to collectively consider how as an industry, with our supply chains we can reduce the risk of modern slavery.

In 2025 for the second time Amey supported, through fund raising activity, 'Ride for Freedom' – a charity that harnesses cycling to raise awareness, educate and forge partnerships to end modern slavery, and to provide remedy to survivors.

Amey actively participates in roundtables and webinars hosted by the Government and the Business Services Association and participated in the CCLA's 'Tackling Modern Slavery in Construction – taking stock on progress' event in October.

2026 priorities

In 2026 Amey will progress the following actions:

- Continue to raise the awareness of modern slavery to our employees and our suppliers through awareness, training and engagement
- Strengthen our approach to supply chain due diligence and auditing, focusing on procurement areas considered the highest risk
- Collaborate with industry partners to ensure best practice is being applied
- Update the learning content, taking into account the written feedback that was submitted alongside the above quality scores
- Collaborate with key industry partners including the Slave Free Alliance and the Supply Chain Sustainability School
- Ensure our approach to reducing the risk of modern slavery is appropriate as we grow internationally

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 2025.



Andy Milner
Chief Executive Officer
March 2026

This statement applies to Amey UK Limited, all of its subsidiary companies and its holding company¹. The statement has also been approved by the Boards of Directors of the following Amey Group companies on today's date:

Amey Limited	Amey LG Limited
Amey Community Limited	Amey OW Limited
Amey Defence Equipment (Services) Limited	Amey OWR Limited
Amey Defence Services Limited	Amey Rail Limited
Amey Defence Services (Housing) Limited	Amey Services Limited
Amey Fleet Services Limited	Amey TPT Limited
Amey Group Services Limited	Enterprise (AOL) Limited
Amey Highways Limited	Enterprise Managed Services Limited
Amey Holdings Limited	Seilwaith Amey Cymru/Amey Infrastructure Wales Limited

¹Project Ardent Bidco Limited, registered in England & Wales, with registered number 14287080, is the non-trading investment holding company of Amey UK Limited.