

Slavery and Human Trafficking Statement 2024

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 ninth 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.

This statement also extends to Amey’s entities that are not legally required to make a statement under the Act, regardless of their location, size or turnover.

Organisational structure

References to the Amey Group in this statement include Amey and its subsidiaries (as defined under the Companies Act 2006). The Amey Group has over 11,000 employees worldwide and operates mainly in the UK with its head office in London.

Amey’s investors are Buckthorn Partners LLP and One Equity Partners.

For the purposes of the Act, joint ventures are not necessarily treated as part of Amey’s supply chain. Each joint venture is structured, governed and operated to align with Amey’s policies and may create their own policies from time to time.

Our business

Amey via its subsidiaries and joint venture partners is a provider of a wide variety of services operating predominantly in the following sectors: consulting, rail, highways, facilities management, defence and justice.

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.

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 are:

1. We put safety first, always: putting safety first, every day, for everyone and with zero exceptions
2. We win as one: our culture of cross-company teamwork and shared expertise creates more value for our clients, our people and end users of our services
3. We bring the best: every day we strive to bring the best version of ourselves to work
4. We are inspired by insight: we innovate, inspire and delivery better solutions through robust data and new insights combined with our deep personal expertise
5. We look after each other: we treat each other with care, respect and honesty in every interaction

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

Our governance for modern slavery

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

Each year Amey creates an action plan to 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.

In 2024, Amey continued to conduct internal audits of specific employee data to identify any potential indicators of modern slavery within the organisation, for example, numerous salaries being paid into one bank account, or an excessive number of people with the same home address. No indications of modern slavery were identified.

Our policy on slavery and human trafficking

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](#).

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. All new Amey employees are provided with, and have access to, a copy of the mandatory Amey Code and are required to complete mandatory modern slavery training upon enrolment.

Our supply chains

During 2024 Amey continued to engage with its supply chain. Failure to respond to any enquiries from Amey carries consequences for those within the supply chain, ultimately including exclusion as a supplier.

Amey's 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 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.

The Amey Group's supply chain includes approximately 5,200 suppliers of varying size and expertise. In 2024 direct spend was approximately £1.25bn of which more than half was spent with small and medium sized enterprises.

As part of the supply chain process, Amey has a number of systems to:

- 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 as part of the identification and prequalification assessment of its suppliers 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.

Amey assesses 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 will be exploited
- No harsh, cruel or degrading practices are allowed
- No discrimination is practised

Failure to comply with the above is an absolute bar to pre-qualification as a supplier to the Amey Group.

Supply chain risk

The Amey Group continues to undertake a supply chain modern slavery risk mapping assessment. The review involves a category specific approach, assessing both the risk of modern slavery occurring and the strategic risk to Amey with the emphasis on those categories considered most at risk. The outputs of the risk assessment informs the onward review and where relevant auditing.

The risk of modern slavery occurring is considered to be high in the following procurement areas:

- Labour Supply / Agency Labour
- Subcontracted Services
- Construction Materials (e.g. bricks, cement, steel)
- Timber and Wood Products
- Stone and Aggregates (e.g. granite, sandstone)
- PPE and Workwear
- Plant and Equipment Hire
- Cleaning and Facilities Services
- Catering Services
- Security Services
- Waste Management and Recycling

In 2024, the Modern Slavery Working Group set out steps to strengthen its processes to identify and assess supply chain modern slavery risk. The implementation of this work runs through into 2025 and includes a refresh of the risk assessment process and onward due diligence.

Recruitment 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.

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. During 2024, the material for our off-line employees was refreshed and championed the use of training film and videos, which provide example scenarios and victim accounts.

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 is an active member of the Domestic Abuse Employers Initiative, and in 2024 continued to raise awareness of domestic abuse, and what to do if an individual or a colleague is subjected to any abuse. Amey also has a network of domestic abuse ambassadors who have been trained in trauma informed response.

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 2024.

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

- Actual and potential incidents raised during 2024: no incidents of modern slavery were raised through any of the channels provided.
- Employee completion of modern slavery training: during 2024, the training module was updated and rolled out across the business, with monthly tracking of progress.
- Screening for duplications in employee data as a potential indicator of modern slavery (next of kin, bank details, bank addresses).
- Percentage of suppliers using Constructionline, of which there were 70% in 2024.

Amey completed the Government's Modern Slavery Assessment Tool for the fifth time in early 2025, with a score of 97%.

Industry engagement

In 2024 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 that collectively we reduce the risk of modern slavery. The focus for the year was in sharing and sign-posting an SME Toolkit, which has since been widely communicated and distributed.

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 2024 for the first 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.

2025 priorities

In 2025 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
- Deliver in-depth modern slavery training to onboarding and recruitment teams to enable them to spot any signs early
- Strengthen its approach to supply chain risk assessment and auditing, focusing on procurement areas considered the greatest risk
- Collaborate with industry partners to ensure best practice is being applied

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 2024.

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 OW Limited

Amey Community 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

Amey LG Limited



Andy Milner
Chief Executive Officer
24 April 2025

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