

Slavery and Human Trafficking Statement 2023

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.

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 eighth 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 was acquired in December 2022 by Buckthorn Partners LLP (“Buckthorn”) and One Equity Partners (“OEP”).

Amey is the ultimate 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 Infrastructure – providing comprehensive hard and soft facilities management services to the Defence, Justice and Local Authority sectors

The three business units draw on support centrally in respect of health and safety and the 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 will set its own policy and will draw on relevant parent company policies as directed.

Our governance for modern slavery

The Amey Executive Committee has overall responsibility of our approach to Modern Day 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 Modern Slavery Working group to review our approach to Modern Slavery, co-ordinate the delivery of the plan and draft the annual statement. The group involves representatives from social value, procurement, HR and legal.

In 2023, Amey successfully conducted an extensive internal audit encompassing personal data, including bank account details, next-of-kin information, and home addresses, for all employees. The primary aim was to identify potential indicators of Modern Slavery within the organisation.

Subsequently, Amey has introduced enhanced protocols to our onboarding process, demonstrating our commitment to proactively identifying and addressing any signs of Modern Slavery promptly.

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 ensure slavery and human trafficking is not taking place anywhere in the supply chains.

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

- The Amey Code, which covers a range of ethical and conduct related policies
- Anti-Slavery and Human Trafficking Policy
- Sustainable Procurement and Supply Chain Policy Statement
- Recruitment & Selection Policy
- Inclusion Policy
- Safeguarding Policy
- Health and Safety Policy
- Social Value Policy
- Dignity at Work Policy
- Wellbeing Policy
- Business Ethics Policy

Amey has an effective grievance and whistle blowing 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. Information on this is also included as part of the employee onboarding process.

Our supply chains

During 2023 Amey continued to engage with its supply chain. Failure to respond to any enquiries carries consequences for those within the supply chain, including exclusion.

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 is 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 4,100 suppliers of varying size and expertise and in 2023 the Amey Group paid approximately £1.3bn to its supply chain.

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 for 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.

Throughout 2023 we worked with Construction Line to introduce a new set of questions for those suppliers considered to be of higher risk, as an output of our 2 yearly supply chain risk assessment. This question set has been tested and will be moving into the live environment in H1 2024, whereby material suppliers in high-risk categories will be required to complete the assessment.

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

A 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 every two years. 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 inform the onward review and where relevant auditing.

The following procurement categories are considered to be of highest risk of modern slavery occurring:

- Personal Protective Equipment
- Recruitment
- Cleaning Supplies and Services
- Catering Supplies and Services
- Temporary Staff
- Tools and Equipment
- Travel

Recruitment and training

The Amey Group 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 the Amey Group each employee is given an overview of the essential policies and information in relation to those policies, procedures and other matters such as whistle blowing.

Building on the training to procurement teams last year, the Amey Group continues to use its web-based training, accessible to its 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 you have a concern.

Key Performance Indicators (KPIs)

Amey's measures to combat Modern Slavery are in constant review and the pro-active regime of training and diligence has continued throughout 2023.

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

- Actual and potential incidents raised through any of the channels provided
- Employee completion of Modern Slavery training
- 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

Amey completed the Government's Modern Slavery Assessment Tool for the fourth time in early 2024, with a score of 97%.

Industry engagement

In 2023 Amey actively participated in the Service and Infrastructure Project Providers Modern Slavery Council, coordinated by the Business Services Association. The aim is work collaborative across the sector, providing tools and support to ensure collectively we reduce the risk of modern slavery. In 2023 Amey contributed to a new SME Toolkit, which has since been widely communicated and distributed.

In 2023 Amey also joined the Action Sustainability and Supply Chain Sustainability School Modern Slavery Working Group, with the aim to collectively consider how as an industry, with our supply chains we can reduce to the risk of modern slavery.

Amey actively participates in roundtables and webinars hosted by Government and the Business Services Association.

2024 priorities

In 2024 Amey will progress the following actions:

- Continue to raise the awareness of Modern Slavery to our employees and our suppliers
- Utilise the new question set and evaluation approach within supply chain onboarding
- 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 2023.

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

- Amey Limited
- 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
- Byzak Limited
- Enterprise AOL Limited
- Enterprise Managed Services Limited
- Seilwaith Amey Cymru/ Amey Infrastructure Wales Limited



Andy Milner

Chief Executive Officer

March 2024