

# 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 and a criminal offence under the Modern Slavery Act 2015 (the “**Act**”). 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.

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;
- implementing and enforcing effective 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 under the Act.

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 statutory obligation 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.

## Responsibilities

The overall responsibility for this policy lies with the Chief Executive but can only be modified by formal agreement of the Executive Committee.

The Modern Slavery Committee 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.

## 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.

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 Amey Whistleblowing Helpline by calling 0800 160 1797. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

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 are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it through the Whistleblowing Helpline.

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, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

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

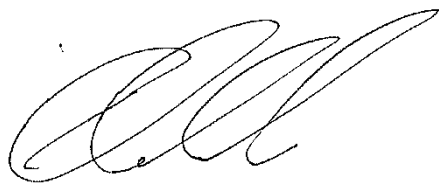
If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.

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.

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	Emily Davies	Andy Milner
2.0	18/01/2024	Annual review and re-brand	Emily Davies	Andy Milner