

## BAM's commitment to combatting modern slavery

BAM is committed to combatting slavery and human trafficking throughout our operations and those associated with our business. This is not a standalone issue, but one which forms part of our approach to ensuring that we treat people with dignity and respect, that we source goods and services responsibly, that we promote and strive for transparency and that we conduct our business with the highest regard to ethical and environmental standards. We are committed to ensuring that all of our employees and third parties performing services for or on our behalf and/or joint venture parties abide by the highest professional and ethical standards.

### Our business

We are a part of Royal BAM Group. We employ 2,600 people and Royal BAM Group has 20,000 employees worldwide. BAM Construct UK operates solely in England, Scotland and Wales but collaborates with nine other operating companies in Royal BAM Group, including on issues of ethical and responsible business practices.

Our business spans the lifecycle of the built environment, consisting of property development, design, construction (and supporting services) and facilities management. More about our services can be found at: [www.bam.co.uk/what-we-do](http://www.bam.co.uk/what-we-do).

### Our supply chain

We have a varied supply chain with a selection of supply chain partners across different parts of the business spanning a wide range of skill levels. While work is ongoing within the industry to identify areas of high risk where modern slavery could occur, we believe that risks mainly lie with lower skilled trades and workforce. We work closely with the industry and our supply chain to identify areas of risk of modern slavery and work in partnership with them to help ensure its prevention.

### Materials and goods

We consider ethical and sustainability criteria when sourcing materials and goods where it is within our remit to do so, and work with our clients to assist them in selecting sustainable and ethically sourced materials. When we provide design services, we specify to industry standards for responsible and sustainably sourced / produced material as outlined in our responsible sourcing and sustainability policies.

### What we are doing

It is the responsibility of all BAM Construct UK employees to be aware of and report any suspected incidents of unfair treatment either within our business or within our supply chain.

In order to identify and mitigate risks, we have set up a cross company working group with our sister company in the UK, BAM Nuttall, to identify and carry out appropriate and proportionate measures that should be taken to minimise the risks of modern slavery or human trafficking in our organisation or in our supply chains. The working group consists of representatives from our legal, human resources, commercial, supply chain and sustainability teams.

During 2017, we undertook the following actions:

- Updated company policies, codes of conduct, KPIs and procedures to take account of modern slavery and human trafficking risks, including updating our employment of labour questionnaire.
- Created an information hub for employees to learn more and access resources related to modern slavery, accessed through our company intranet.
- Promoted awareness of the issue, including by developing a tool box talk and posters and sharing e-learning modules produced by partners e.g. the Supply Chain Sustainability School and by participating in campaigns such as 'Stronger Together'.
- Implemented a new procedure for right to work eligibility checks, including questions and guidance for our supply chain partners on how to ensure they are employing people legally and therefore combatting modern slavery.
- Launched 'Speak up', a confidential hotline for staff and stakeholders to confidentially report any instances of potential unethical behaviour, including modern slavery.

During 2018 we are:

- Working with a third party to carry out a gap analysis of our current approach in line with ISO 20400, to assess potential risks in our supply chain and develop recommendations for improvement.
- Aiming to develop BAM-specific training and communications for employees, project teams and suppliers following recommendations from the gap analysis.

### Due diligence

We have a supply chain compliance programme in place to ensure all those in our supply chain and contractors share our values. This comprises:

- Supply chain employment questionnaire
- Annual reviews with our tier 1 suppliers
- Project-specific supply chain questionnaire for all suppliers

We have appointed a Compliance Officer who is accountable to our Board and responsible for overseeing compliance with the Modern Slavery Act and annual preparation of the Modern Slavery Act Transparency Statement. Our Supply Chain, Commercial, Human Resources and Sustainability departments are also involved with ensuring the robustness of our measures within BAM Construct UK to guard against modern slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2017.



**James Wimpenny**  
Chief Executive