



BAM Construct & Ventures UK Limited

# Modern Slavery Statement 2022

Building a  
sustainable **tomorrow**





# BAM Construct & Ventures UK

## Modern Slavery Transparency Statement 2022

This statement, pertaining to BAM Construct & Ventures UK Ltd for the calendar year 2022, sets out what we are doing to assess and mitigate the risk of and stamp out slavery and human trafficking in our business and our supply chain, and the progress made since our last statement covering the year 2021.

In preparing this statement and considering our plans, the potential impacts of worldwide crises have been considered, including; interest fluctuations, UK cost of living crisis, post pandemic consequences and the war in the Ukraine. We believe there continues to be an increased risk of unfair treatment and low paid workers in the wake of these significant factors. As a result, extra vigilance is needed to help stamp out slavery.

### Our business and values

BAM Construct & Ventures UK Ltd is a part of Royal BAM Group, a Construction, Facilities Management and Property Development enterprise operating in Europe and internationally employing more than 13,000 people globally. BAM Construct & Ventures UK employs over 2,000 people and operates in England, Scotland and Wales and we have collaborated with our sister company, BAM Nuttall in developing our approach to stamp out slavery.

On 1 January 2022 Royal BAM Group changed its organisation structure to two geographic divisions and in the course of which BAM Construct UK Ltd changed its name to BAM Construct & Ventures Limited.

This statement applies to BAM Construct & Ventures UK Ltd and its subsidiaries, BAM Construction Ltd (including BAM Services Engineering, BAM Design and BAM Plant now BAM Site Solutions), BAM Properties Ltd and BAM FM Ltd. BAM's UK & Ireland Division employs in excess of 6,500 people.

Our purpose is to create sustainable environments that enhance people's lives. We are committed to being a sustainable business and want to have a net positive impact on climate, resources, and people by 2050, as measured against science-based targets.

Our business spans the life cycle of the built environment, consisting of property development, design, construction, services engineering, plant and facilities management. More about what we do can be found at [ukandireland.bam.com](https://ukandireland.bam.com). We are committed to being a sustainable business and ultimately want to have a net positive impact on climate, resources and people.

Our BAM Values are the guiding principles by which we conduct ourselves and our business, which helps to build sustainable success. Our values underpin what we do and help to create a culture of accountability, responsibility and collaboration on a range of issues, including modern slavery. They are adopted in the BAM Code of Conduct which, along with our policies and procedures, supports the ways in which we tackle modern slavery.

BAM is committed to collaborating with its stakeholders to combat 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:

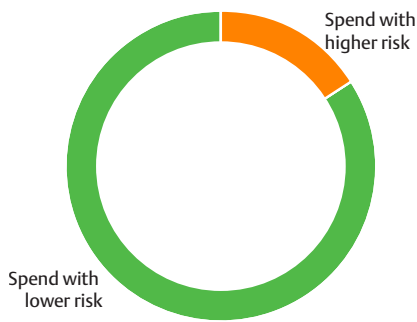
- Treat people with fairness, dignity and respect
- Source goods and services responsibly
- Promote and strive for transparency
- Conduct our business with the highest regard to ethical and environmental standards.

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. We strive to enhance peoples lives across communities where we operate. This includes the way that BAM is involved in tackling modern slavery in the wider industry to help to make a difference.

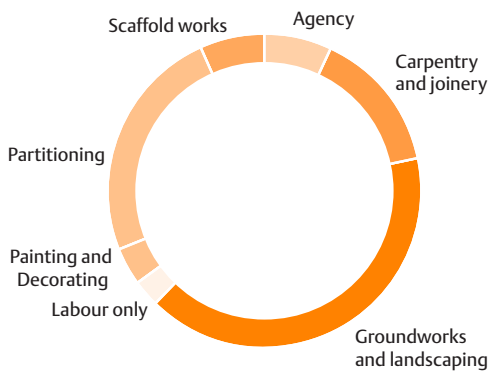
The BAM Code of Conduct is based on the BAM values and sets out the minimum expectations of and how it expects its employees and contractors to behave. This is supported by our Sustainable Business Policy and Ethical Business Policy which outline our commitments and minimum requirements to procurement and how we conduct our business. These ensure a robust policy-based approach to tackling modern slavery.



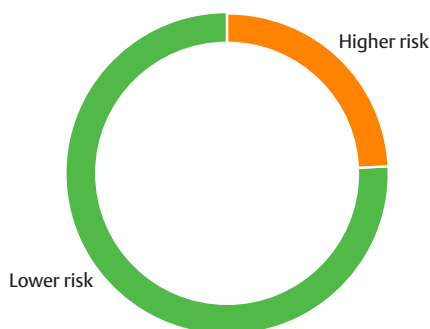
### Risks associated with labour



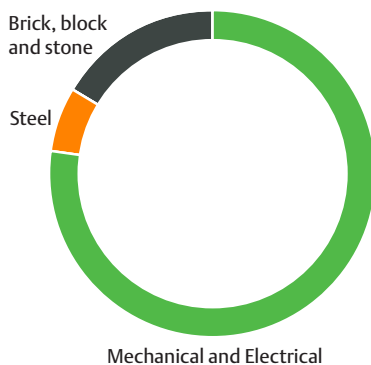
### Subcontractor breakdown



### Risks associated with materials



### Materials breakdown



## Our supply chain

Our Supply Chain Purpose is 'To create and maintain ethical and sustainable collaborative relationships with supply chain partners, embracing core BAM values, which generate mutually beneficial outcomes through early engagement and market'.

BAM Construct & Ventures UK Ltd is part of the BAM UK & Ireland Division, our Supply Chain management and Procurement teams are managed by the Delivery Assurance function at a divisional level and as such embed our divisional targets and values into everything we do.

The Supply Chain management & Procurement function creates and manages the overall strategy for how BAM interacts with its supply chain - covering suppliers, subcontractors and consultants.

Supply chain categorisation and category management within BAM UK and Ireland ensures BAM is committed to including modern slavery prevention and ethical procurement practices in its evaluation and selection criteria.

### Subcontractors and service providers

We have a large and complex supply chain from construction package subcontractors to service and consultancy suppliers, working across different parts of the business spanning a wide range of skill levels. Approximately 80% of our turnover is spent with our supply chain, comprising of some 5,000 vendors. We have a supply chain management system to register, vet and monitor our subcontractors and service providers and dedicated procurement managers across the business to manage relationships.

### Materials and goods

We procure materials and goods to service our business operations, but the majority of materials are sourced through our subcontractor supply chain and are specified to meet the needs of our clients and the projects we deliver for them.

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, or procure materials and goods directly, we specify to industry standards for responsible and sustainably sourced material as outlined in our responsible sourcing and sustainability policies.

This includes all timber from legal and sustainable sources, recognised responsible sourcing certifications for other materials, such as BES6001 and ethical supply standards, such as dimensional stone from suppliers operating to ETI base code guidelines.

### Hotspots and risks

Working with a third party, Action Sustainability, we previously carried out a high-level risk assessment of our spend. This identified the key trades and categories of spend where there is potential for higher risk of modern slavery or issues which may lead to modern slavery, such as low paid labour. The key risks identified for us are in contractor supplied materials sourced outside of the EU and where there may be low skilled or migrant labour used. From this work, we have identified 10 categories of spend for further assessment and engagement (split into labour and material risk areas).

More recently, BAM Construction completed the online Modern Slavery Assessment Tool ('MSAT') to assess gaps in our modern slavery programme and support a strategy for future aims. As many of our key customers review MSAT outcomes, this allows us to further align with our partners, sharing both values and goals. The MSAT has helped us to focus on specific hotspots and risks of exploitation and the safeguards we can implement to mitigate risk. As a result of the MSAT outcomes, a refreshed action plan has been developed to achieve key objectives, for example, a standalone Modern Slavery Policy that can be used in the engagement and management of supply chain relationships.

We continue to learn from partners, clients and our supply chain about potential risks and will continually evolve our approach to identifying and acting on risks. We also continue to work with our preferred suppliers to establish long term and collaborative relationships to mitigate risks. It is our intention to continue working with our peers, our suppliers and regulators to share information and intelligence to improve our and wider industry understanding of where risks of modern slavery lie. We will update our risk assessment over time and report back on findings and actions taken.



## What we are doing

We encourage all BAM Construct & Ventures UK employees to be aware of and report any suspected incidents of unfair treatment either within our business or within our supply.

We have a working group with representatives from our legal, human resources, commercial, supply chain and sustainability teams who continue to collaborate with our sister company in the UK, BAM Nuttall, to identify and carry out the 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.

Our responsible sourcing and business ethics policies set out our commitments and minimum requirements.

## What we have done during 2022

We have continued to build on our Modern Slavery gap analysis, carried out in collaboration with BAM Nuttall and Action Sustainability, as well as the feedback from the Modern Slavery Assessment Tool, which we complete annually our work continues to be focused on three key areas:

- Compliance and due diligence
- Education, training and engagement
- Industry engagement

A summary of our key actions is provided below:

### Compliance and due diligence

- Constructionline Gold is a mandatory requirement for all construction subcontractors and all FM vendors. At the time of writing, the number of BAM related supply chain members, subscribed to Constructionline Gold status, is in excess of 3,100. This sets higher standards for environmental and social sustainability disclosure by the supply chain, including requirements on modern slavery processes
- As part of BAM Construct & Ventures move to a category management approach, we have an integrated set of sustainability requirements in our tendering and supply chain partner requirements. Modern slavery and an organisations approach forms part of the selection and award criteria and specific terms and conditions related to modern slavery are in place for new contracts. This allows us to set standard levels of expectation with supply chain partners linked to the Modern Slavery Assessment Tool and forms a basis for ongoing engagement and collaboration
- Informed by our risk assessment against category of spend, we further engaged with a group of subcontractors on their compliance with Home Office Guidance for eligibility and right to work
- We continued to work collaboratively with clients, supported by a third party charity and our supply chain, to develop new approaches to modern slavery identification and prevention, including working with these parties to support us in our response to modern slavery
- We continued to work with a third party in order to engage with and audit a number of our supply chain specifically around modern slavery risks
- Following an extensive, national review of our temporary labour providers, we have focused on a smaller number of vetted and approved companies, with our agreements containing more robust modern slavery requirements. These requirements are aligned with our ambitions to improve our Modern Slavery Assessment Tool (MSAT) results



## Education, Training and Engagement

We have identified communication, training and engagement on modern slavery as a priority for BAM and have included:

- Working with the Supply Chain Sustainability School to engage with and provide training to our supply chain. During 2022, we continued to promote the School to all of our priority suppliers and encouraged them to use resources and undergo training.
- During 2022, 343 of our priority suppliers made use of training resources through the supply chain school, with a total of 2,141 individuals accessing 2,093 different training resources
- A further 478 companies from our wider supply chain made use of 2,135 different training resources (with 1,599 individuals accessing these)
- Resources accessed include e-learning, guidance documents on tackling modern slavery and ethical procurement practices, toolkits (e.g. for supply chain mapping) and videos
- Modern slavery e-learning was added to our training schedule for all employees at the end of 2019. In total, 650 employees had completed the training at the end of 2020
- We continued to promote our Modern Slavery Information hub on our intranet, BAM Connect, which provides a range of resources that all of our sites and other locations have been asked to use, such as posters, toolbox talks and workshop materials
- Modern slavery forms part of the Royal BAM Group Code of Conduct. Mandatory training applies to all employees, and we have a 98% training completion rate
- Projects continued to display our awareness posters and used our toolbox talk
- Modern slavery awareness continued to be promoted as part of supply chain annual reviews, supply chain events and through direct email communications
- We further embedded our response protocol for construction sites to guide our teams on the appropriate processes and actions needed should an incidence or suspected incidence of modern slavery or related activity be identified.
- We maintained our translation service 'Clear Voice' which can be used by sites to aid conversations with non-English speaking members of our supply chain.
- We began work to refresh the BAM Code of Conduct with increased focus on human rights and prevention of modern slavery
- We carried out a number of targeted briefing sessions with teams across the business focusing specifically on modern slavery, including our responsibilities and what to be aware of and how to respond to potential modern slavery

## Industry Engagement

- We have signed up to The Construction Protocol, to work in partnership with the Government and our peers to protect vulnerable workers, share intelligence and best practice, raise awareness and to work on joint initiatives across industry [www.gla.gov.uk/i-am-a/i-use-workers/construction-protocol](http://www.gla.gov.uk/i-am-a/i-use-workers/construction-protocol)
- We continued to collaborate with our peers through the Supply Chain Sustainability School to collectively improve industry performance on sustainability issues, including modern slavery
- We completed the UK Government Modern Slavery Assessment based on 2022, with an improved overall score and have shared our responses and information with
- Government departments. This has also led to further additions to our action plan and approach, which we will report on in our 2023 statement
- We continued to engage with Construction line to feedback on improvements they could make to their question set and processes related to modern slavery
- We developed a UK & Ireland criteria for Pre Qualifying Questions and onboarding process for temporary labour, including updating our labour agreements

We're collaborating with industry to tackle modern slavery together



Gangmasters & Labour Abuse Authority



BAM has linked its sustainability strategy to the sustainable development goals we have the biggest opportunity to influence. Eradicating forced labour is a central focus for goal 8.



## Plans for 2023

Our plans for 2023 include further actions following and also informed by our UK Government Modern Slavery Assessment. A summary of our plans is provided below.

### Compliance and due diligence

- Build on our risk assessment work to engage higher risk trades, and Constructionline Gold, to engage with 25% (by spend) of key suppliers identified in higher risk categories
- Continue to address modern slavery as part of the category management procurement process, including requirements for suppliers to demonstrate high standards of due diligence and transparency
- Continue to work with Constructionline to enhance our approach, including feasibility of extending our Constructionline requirement to our key material suppliers and continuing the role out of facilitiesline gold accreditation for our FM subcontractors and suppliers
- Further onsite labour practices audit on at least one live construction project
- Expand our response protocol for construction sites to guide our teams on the appropriate processes and actions needed should an incidence or suspected incidence of modern slavery or related activity be identified. Continue to raise awareness within our supply chain of their responsibilities, BAM's policy and expectations
- We will review the potential for a division wide modern slavery policy and will implement if appropriate

### Education, Training and engagement

- Continued roll out and take up of modern slavery e-learning, with a target that 75% of our employees will have completed this during 2023
- Roll out our refreshed BAM Code of Conduct and mandatory training with increased focus on human rights
- Continued roll out of 'practitioner' level training for site-based teams to equip them with the knowledge and awareness they need to be first responders should an instance of modern slavery be identified
- Continue to promote awareness and engagement on modern slavery as part of our supply chain communications, events and annual reviews including through our National Virtual Supply Chain Conference in June 2023, which included a Modern Slavery section. This explained how expectations from BAM, Clients and the Government have increased and the need for the supply chain to train their staff, map their supply chain, identify risks and implement robust due diligence processes.
- Continue to hold modern slavery awareness sessions on key projects

### Industry engagement

- We will continue to collaborate across our UK & Ireland division to collaborate and learn from each other and our supply chain partners
- Collaborate with others in industry through forums such as the Construction Protocol and specifically with those providing support to victims of modern slavery to assess how we can support any victims identified in our supply chain
- Continue to collaborate with Constructionline to look at additional ways in which they are able to support us in combating Modern Slavery
- Update our UK Government Modern Slavery Assessment to share progress on our actions plans with government
- Share examples and case studies (through our website and social media channels, and through industry groups) of what we're doing, what we've learnt, risks and areas for improvement
- Continue to collaborate with clients and industry experts, including supporting pilot industry initiatives Summary

### Summary

Our people are fundamental to our success. By continuing to train our people about modern slavery, we continue to create greater awareness, not only in our business, but within society at large.

The potential impacts of worldwide crises have been considered, including interest fluctuations, UK cost of living crisis, post pandemic consequences and the conflict in Ukraine presents a risk to modern slaves being exploited in our industry. Our 2023 actions will mitigate these risks in BAM's aim to stamp out slavery.

Our supply chain is an intrinsic and valuable part of our business. As such it is essential that we engage with all our suppliers and subcontractors. Together we will stamp out slavery.

### 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:

- Constructionline pre-qualification programme. We require our supply chain to achieve Gold certification of Construction line in order to work for us, this includes complying with requirements related to modern slavery as well as employment of labour and responsible sourcing
- Regular reviews with our Category 1 supply chain, including review of sustainability performance and actions to combat modern slavery
- 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
- Terms and conditions which include a number of modern slavery related requirements
- Provision of ongoing support and access to training for our supply chain to combat modern slavery

Underpinning these specific activities, the fight against modern slavery is made by all of our people, starting with our Senior Leadership Teams who fully support our modern slavery plan and are instrumental in incorporating measures into our strategy and approach to help tackle this.

A team including an executive sponsor, as well as members of our Supply Chain, Commercial, Human Resources, Sustainability and Compliance teams are also involved with the remit of ensuring the robustness of our measures to guard against modern slavery and human trafficking.

BAM Construct & Ventures Ltd is fully committed to stamping out modern slavery and our close collaboration across the UK & Ireland division will further support our progress

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending 31st December 2022.**



**James Wimpenny**  
Executive Director – Construction  
For and on behalf of  
BAM Construct & Ventures UK Ltd  
June 2023



**Simon Finnie**  
Executive Director – Ventures  
For and on behalf of  
BAM Construct & Ventures UK Ltd  
June 2023



# Building a sustainable tomorrow



BAM Construct & Ventures UK Ltd  
Breakspear Park  
Breakspear Way  
Hemel Hempstead  
Hertfordshire  
HP2 4FL

Tel 01442 238 300  
[ukandireland.bam.com](http://ukandireland.bam.com)