

M^{ODERN} SLAVERY

Seventh Modern Slavery and Human Trafficking Statement

**Sir Robert
McALPINE**

This is our seventh Modern Slavery and Human Trafficking Statement, and it has been written and published in accordance with Section 54 of the Modern Slavery Act 2015.

Our statement sets out the actions Sir Robert M^cAlpine Limited (Sir Robert M^cAlpine) has taken in the previous financial year (1st Nov 2021- 31st Oct 2022) to address the inherent risk of modern slavery and unethical labour practices within our industry and supply chain. We continue to progress our key actions, which have now become business as usual.





OUR COMMITMENT

Since the introduction of the Modern Slavery Act in 2015, our commitment to combating the risk of modern slavery has remained steadfast.

As we continue to work to address this issue, we are even more determined to take every action we can to ensure that everyone involved in our projects, whether they be our own people or contributing through our supply chains, are treated fairly, with respect, dignity and humanity. We believe decent work must receive decent pay. We commit to working collaboratively with all our people, including those who work with us as part of our supply chain, to deliver what we hope will be lasting change within our industry and society.

At Sir Robert McAlpine, we understand the role we play in our industry and beyond with regard to combating modern slavery and labour exploitation in its entirety.

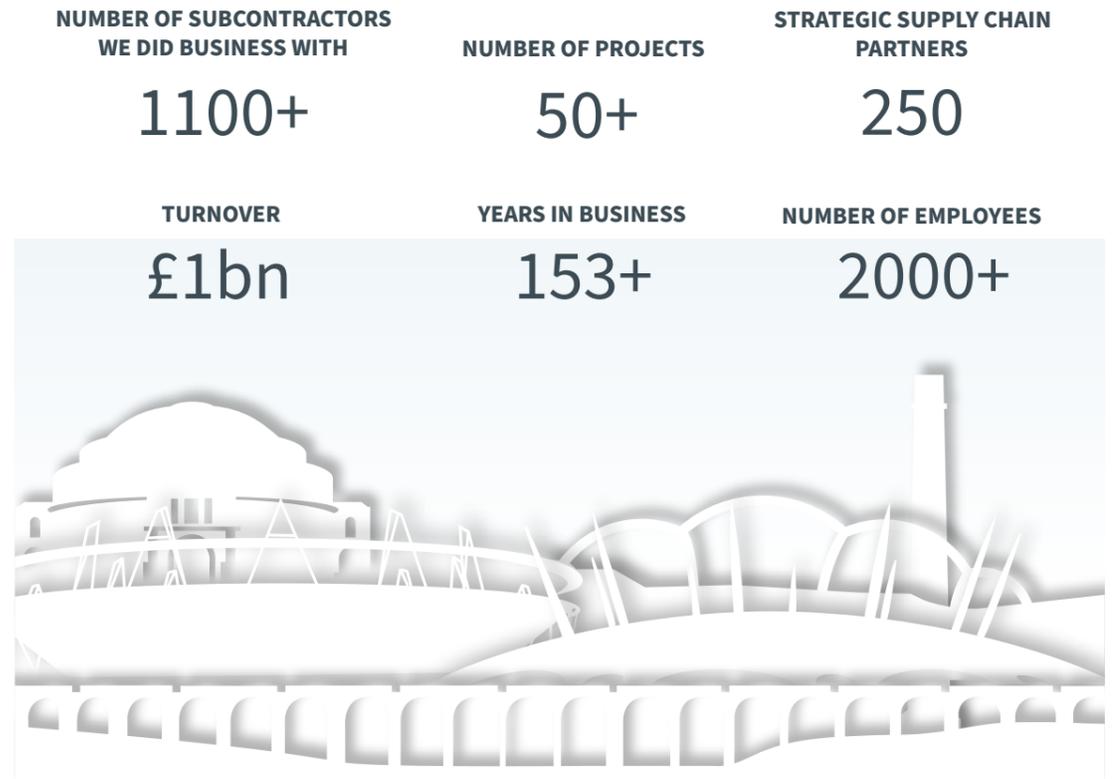
We recognise the importance of leading by example and working in collaboration with our supply chain partners to eradicate this fundamental violation of human rights.



ORGANISATION STRUCTURE AND SUPPLY CHAINS

We are a leading family-owned building and civil engineering company established since 1869. We design, develop, build and preserve some of Britain's most iconic buildings.

The projects we deliver cover a wide spectrum of sectors including, commercial, residential, retail, leisure, healthcare, education and infrastructure. While we deliver projects predominantly within the UK, the nature of our supply chain is global and therefore we must look beyond the UK when assessing the risk of modern slavery and unethical labour practices.



The sectors we operate in





SUMMARY OF KEY DELIVERABLES TO DATE

Development and delivery of modern slavery training

Engagement with supply chain partners to raise awareness of modern slavery

Continual delivery of third-party audit programme

Signatory and active participant of the GLAA Construction Protocol when it was in existence

Initial supporter of the BES 6002 Ethical Labour Sourcing Standard

Development of our Labour Code of Conduct

Working to raise awareness of modern slavery through participation in industry events and webinars

POLICIES

In 2019 we developed our **Labour Code of Conduct**, partly in response to the audit programme we had started. We continue to audit our supply chain in line with this Code and it is reviewed yearly and updated as needed.

Whistleblowing Policy:

our Whistleblowing Policy explains the means by which anyone can raise a concern. We operate an independent third-party whistleblowing helpline (0800 047 4037) which is also advertised on our projects. This means our helpline is not simply available to our people, but anyone working as part of our projects.

Recruitment and Selection Policy:

as part of our Recruitment and Selection Policy, we state that no person should be charged a fee to obtain a job.

TRAINING

We continue to implement our mandatory e-learning training module for all employees

SUPPLY CHAIN PARTNERS

Our supply chain partners are broadly split into three categories:

- **Subcontractors (those providing labour and materials for a subcontract package on a project)**
- **Suppliers (those providing materials and no labour)**
- **Commodities (all overhead and indirect procurement)**

We continue to focus on addressing the risk of modern slavery and labour exploitation in our subcontractors and their supply chains. We believe that this is where there are the greatest, unknown issues and where we have most leverage to enact change. We acknowledge that the risk is present in all companies we work with.



Our supply chains are never static and can vary depending on the projects we deliver and the clients we work with. In the financial year 1st November 2021 to 31st October 2022, we worked with just over 1,100 subcontractors. What we consider to be our strategic supply chain, however, is a much smaller group which numbers around 250 during 2021-2022. These 250 subcontractors are tiered and account for around 75% of our spend.

We also work with a large number of suppliers, which in this reporting year, numbered just over 2,000.





DUE DILIGENCE PROCESS

We understand how important it is to know our supply chain and who employs the people working on our projects.

Therefore, we continue to work with Achilles to carry out a third-party due diligence programme.

For the financial year 2021-2022, 29 ethical labour audits were carried out and 12 ethical site engagement surveys took place. As in previous years, we have ensured the audits cover a range of different subcontractors and projects in terms of size and sector. This year also saw us use the audits for the first time as part of a tender process.

During this reporting period, Sir Robert M^cAlpine was a member of the Achilles Ethical Business Working Group. The group is made up of businesses that use the Achilles ethical audits and who work together to identify trends in the industry and discuss ways to address risks around unethical labour practices.



To date 21 ethical site engagement surveys have taken place on our projects (a number in conjunction with our clients) and 107 ethical labour practice audits have been carried out within our supply chain. Over the last few years, we have seen an improvement in various areas assessed under these audits. This includes our workforce being more aware of modern slavery as an issue and an improvement in the number of right to work checks being carried out correctly. We believe this is due, in part, to increased engagement with those working on our sites and our work with our supply chain partners to ensure good labour practices are maintained.

Issues are, however, still being raised. Whilst we are seeing a greater understanding within the industry of incorrect labour practices and how best to mitigate against them, we still need to be thorough in our actions to address the risks.

We acknowledge that this work is not concluded but we are encouraged by the positive impact engaging with our supply chains is having.

INDUSTRY COLLABORATION

We are committed to making further progress on tackling the risk of modern slavery in our supply chains and the wider industry.

We can't do this alone and will continue to work collaboratively with our peers and supply chain partners.

While we strive as an organisation to tackle the risk of modern slavery, we firmly believe that collaboration with our peers is key, as issues are seldom restricted to one main contractor and are more often a reflection of the wider industry.

We have learnt a huge amount about the wider issue of labour exploitation through engaging with our supply chain partners and peers. We believe that the learnings we have gained are something that can positively contribute to ensuring construction proactively works to address the risk of modern slavery.

This Statement is wholeheartedly supported and approved by the Executive Board on 29th March 2023.



Paul Hamer
Chief Executive
Date: 29th March 2023



Steve Hudson
Group Commercial Director
Date: 29th March 2023



Proudly building Britain's future heritage

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