



Modern slavery and human trafficking statement

2021

Sir Robert
M^cALPINE

The following statement has been published in accordance with the Modern Slavery Act 2015 and it sets out the actions Sir Robert M^cAlpine Limited (Sir Robert M^cAlpine) has taken in the previous financial year (1st Nov 2019– 31st Oct 2020) to address the inherent risk of modern slavery and unethical labour practices within our industry.

Our commitment

At Sir Robert M^cAlpine we understand the role we play in our industry and wider business with regard to combating modern slavery and labour exploitation in its entirety.

As a tier 1 main contractor, it is our responsibility to set an example to our supply chain partners and our clients and work with them to tackle the very real and present issues.

Our company values of being an honourable and responsible business is central to how we conduct ourselves and deliver a built environment that we can be proud of.

We are working to ensure that everyone involved in our projects, whether they be our own employees 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.

Covid-19

We set ourselves a number of key objectives to achieve during 2019-2020 and despite the challenges presented by Covid-19 we continued to work towards our objectives, delivered new initiatives and made further progress on our work in this area.

While the Government has allowed companies to delay the publication of their statement, we feel it is important to maintain our current reporting cycle as it allows us to be open and transparent in what we have progressed with to date.

The safety of our people and all those who work on our projects and in our offices is at the forefront of the business mind.

With the UK Government announcing the first lock down at the end of March 2020, we took the decision to close all our non-critical works (projects) to allow us to assess what we needed to do to re-open them in a safe and compliant manner.

From the end of April 2020, we began to re-open our projects where we could do so safely.

We have always implemented stringent health and safety measures but since April, we have worked to ensure that those measures protect our workforce against Covid-19 risks and we continually review and update such measures.

The diagram below illustrates some of the actions we have taken.



We are proud to have been able to support the construction of several NHS Nightingale hospitals across the country. This includes hospitals in Manchester, Preston, Bangor and Jersey.

Unfortunately, like many businesses across the country, we had to make the difficult decision to furlough a proportion of our people at the start of the outbreak.

Writing this Statement now, towards the end of 2020 we look back on the last few months and are proud of the way our people and our supply chain partners have responded.

Summary of key actions

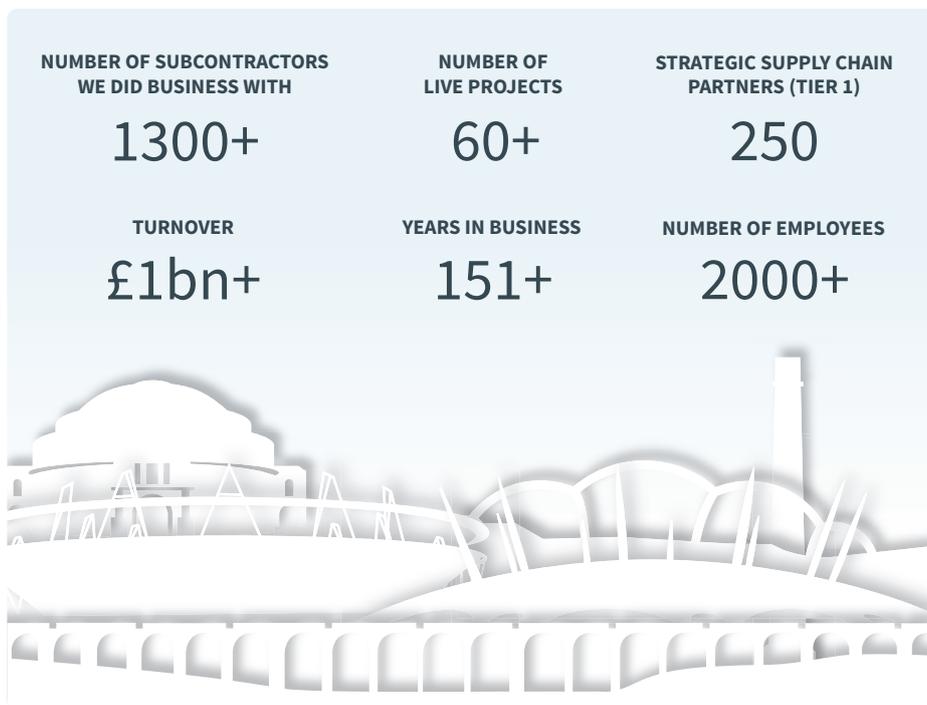
<p>We said we would continue and extend our audit programme.</p>	<p>We continued with our audit programme. Covid-19 meant we couldn't carry out as many as initially planned but we did progress to auditing more tier 2 members of our supply chain.</p>
<p>We said we would continue to roll out our Labour Code of Conduct.</p>	<p>Strategic supply chain partners continued to sign our Labour Code of Conduct. We plan to review and update it this coming year.</p>
<p>We said we would provide an online information portal where our people can find out more information on modern slavery and what we are doing.</p>	<p>We established a portal on our internal intranet so our people can access useful resources and understand what we are doing to address modern slavery.</p>
<p>We said we would investigate further targeted training we could provide.</p>	<p>We worked with the Supply Chain Sustainability School to provide a training webinar for our supply chain partners. This coming year we are looking at increased training for our own people.</p>
<p>We said we would continue to be verified to the Ethical Labour Sourcing Standard, BES 6002.</p>	<p>We continued with our verification to BES 6002.</p>

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



Supply chain partners

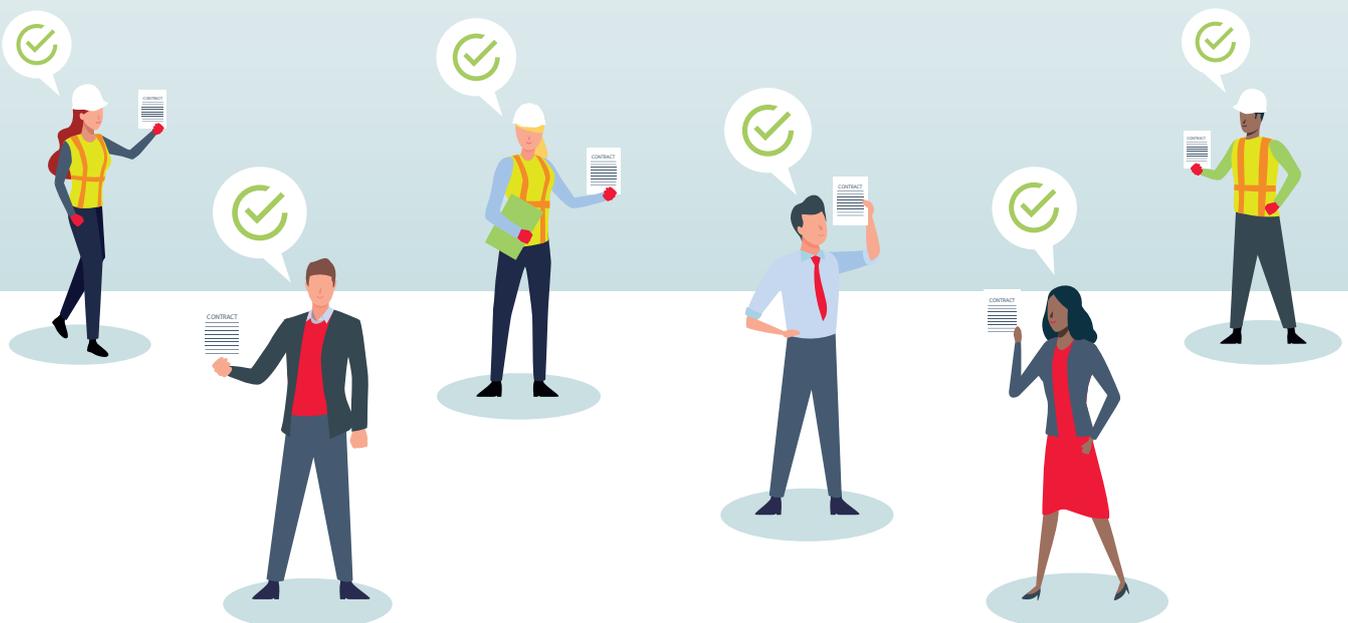
We split our supply chain partners into three high-level categories:

- 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)

To date the focus of our work to combat modern slavery has been centred on our subcontractors and their project labour supply chains. We believe our influence is greatest regarding our project labour supply chains, hence why we have focused our efforts here, but we understand that we must extend this work to our material supply chains.

We work with a strategic supply chain of 250 subcontractors. These are companies that we work most regularly with across our projects. However, in total, we can work with over 1,300 subcontractors (2019-2020).

We have a number of material framework agreements in place with suppliers, and currently there are 53 of these frameworks in place. However, across a year we can work with over 2,000 suppliers (2019-2020 figure).



Policies in relation to slavery and human trafficking

Labour code of conduct

Back in 2019 we developed our first Labour Code of Conduct. This was in response to the audit programme we had begun to roll out and the key findings that were being raised. The Labour Code of Conduct contains twenty-eight clauses stating our expectations and requirements.

The code covers a range of topics and potential issues and some points simply state what legal compliance is. We have continued to communicate this Code to our strategic supply chain, asking them to sign it to show their adherence and support of it. An Objective for 2020-2021 is to review the Code in full and ensure it is up to date with the key findings from our audit programme.

Whistleblowing policy

Our Whistleblowing Policy explains how anyone can raise a concern and through what means they can do so. We have an independent third-party whistleblowing helpline (0800 047 4037) which is also advertised on our projects so it is not simply SRM employees that can utilise it, 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.

The infographic is divided into two main sections. The left section, titled 'End modern slavery', features the Sir Robert McAlpine logo and provides information on how to report modern slavery, including contact details for the National Modern Slavery Helpline (08000 121 700) and the Sir Robert McAlpine Whistleblowing Helpline (0800 047 4037). It also mentions that the infographic was created by their supply chain partner, Marshalls. The right section, titled 'Signs of Modern Slavery', lists six categories of signs: Physical appearance, Psychological trauma, Isolation, Restricted freedom, Reluctant to seek help, and Unusual travel times. Each category includes a brief description of what victims may appear like.

End modern slavery

Sir Robert McALPINE

You know what's right and what's not; you make the call... Remember, in doing the right thing never ever step in and put yourself or the victim in further danger. Simply make a call, that's more than enough. Job done.

Ways to report modern slavery and seek assistance

If you see someone in danger
Call the Police **999**

If you want to report an instance of modern slavery, call:
National Modern Slavery Helpline **08000 121 700**
or report at www.modernslaveryhelpline.org

If you see something which makes you uncomfortable, or is a red flag for you at anytime, call:
Sir Robert McAlpine Whistleblowing Helpline
0800 047 4037

Created by our supply chain partner **Marshalls**

Signs of Modern Slavery

- Physical appearance**
Victims may appear: malnourished and starved; neglected and scruffy; unclean with poor hygiene; acutely tired and exhausted; drugged or drunk; have incorrect clothing or equipment for the job.
- Psychological trauma**
Victims may appear: fearful or scared; anxious or stressed; angry or agitated; withdrawn; traumatised; confused; unable to make themselves understood.
- Isolation**
Victims may appear: withdrawn; unable to communicate effectively; unable to understand you; unable to speak English; have someone else speak on their behalf.
- Poor living conditions**
Victims may appear: to be living at a place of work; to be living in an overcrowded house; to be living in a dilapidated caravan or outbuilding; living in a place with blacked-out windows; have no heating or running water; live somewhere that is clearly not fit to live in.
- Restricted freedom**
Victims may appear: unable to come and go freely; be reluctant to leave their situation; be unable to find or show identity documents such as a passport or bank account details; be in debt to or dependent on someone else; be unwilling to handle money; to be in places where doors are locked on the outside.
- Reluctant to seek help**
Victims may appear: reluctant to talk to you; reluctant to being helped by you or others; reluctant to leave their situation; fearful of you or the authorities; fearful of reprisal from someone else; unable to prove their legal status to be in the UK.
- Unusual travel times**
Victims may appear: to travel at unusual times; travel very early in the morning or late at night; have transportation to and from work provided for them; have to pay for the transport.

Due diligence process and risk assessment

At the beginning of our financial year in November 2019, we agreed to continue developing and expanding our supply chain assessment programme that we carry out with a third party.

The objective for this year was to complete 48 Labour Practice audits and 12 Site Engagement Surveys. We were progressing well with these as planned up until the end of March 2020. With the closure of our sites for a short period of time at the beginning of the first lock down and then the continued furlough period over the next few months, it resulted in us pausing this assessment programme. However, since our new financial year that begun on 1st November 2020, we have re-commenced the supply chain assessment programme.

Prior to the first lockdown, we managed to carry out 17 of the proposed 48 Labour Practice audits. This included auditing our tier 2 supply chain partners. This is something that we will continue to do as part of the 2020-2021 plan. From the assessments to date, we believe that the risk in regard to modern slavery exists predominantly past our tier 1 subcontractors and therefore the need to assess our tier 2 supply chain partners.

Assessing the tier 2 supply chain partners, allows us to further understand our supply chain, understand where risks may be present and communicate our requirements and messaging around modern slavery to a greater number of companies. However, it is important that we continue to assess our tier 1's as we use the audits as an engagement tool to communicate our requirements and the importance of tackling modern slavery. It also allows us to access the tier 2 supply chain partners and understand who they are.

In 2019-2020 we also targeted particular subcontractors work packages. This was because of the information that we were gaining from our assessment programme and the intelligence that we were receiving from the industry groups that we are part of. It led us to focus on the dry lining industry due to the nature in which labour is often bought onto our sites. We will continue to focus on this area into 2021.

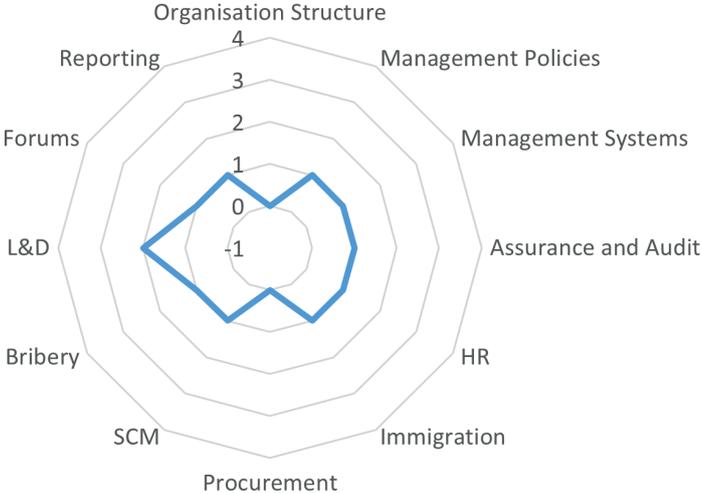
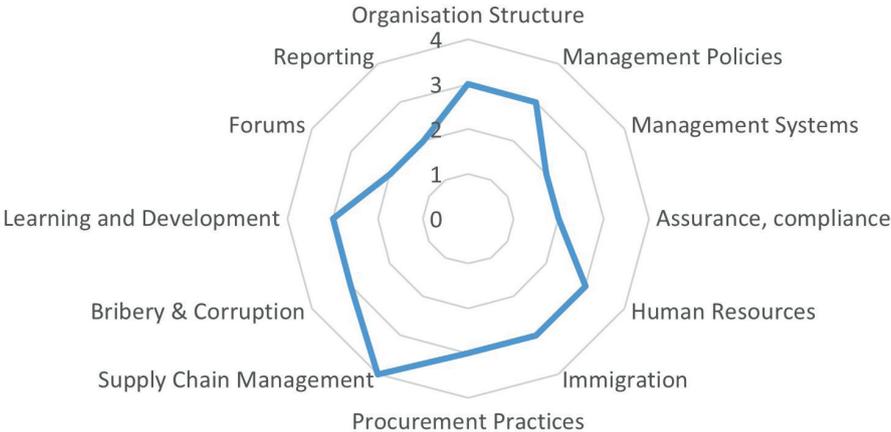
Due to Covid-19, we have had to make alterations as to how we carry the audits out. For example, currently the Labour Practice audits are carried out online over Microsoft Teams. We have had to adapt to the current circumstances and carrying out an audit online is different and poses some new challenges, but we are working to ensure they are as effective as possible.

We are planning to carry out Site Engagement Surveys starting in the Spring of 2021 but due to the nature of these having to be in person, we are taking time to establish safe and effective methods of doing so.

Key performance indicators to measure effectiveness of steps being taken

As part of our verification to the BRE’s Ethical Labour Sourcing Standard, BES 6002 we set ourselves a series of Objectives. Our certification details can be found on the GreenBook Live website at ELS0002_Issue-5.pdf (greenbooklive.com)

We recently completed the fourth verification process and the first spider diagram below shows our verification levels across the twelve areas of assessment. The second spider diagram below is from our first verification. Comparison between the two illustrates our progress to date.



From the Objectives that we set ourselves last year, we did not achieve all of them to the extent that was intended and have therefore carried some of them over as part of this year's Objectives. The Objectives that we have agreed for this year include:

- Audit Programme** Continuing our audit programme of Labour Practice Audits and Site Engagement Surveys
- Code of Conduct** Reviewing and updating our Labour Code of Conduct
- Risk & Assurance** Incorporate the results from our audit programme into the Risk and Assurance Committees review
- Training** Develop role specific training on modern slavery for our Works Staff
- Communication** Develop an impactful Modern Slavery Communications Campaign for our Offices and Projects



Training on modern slavery

Internal training

We first rolled out an e-learning module for our people back in 2017, which we have used to increase the awareness of modern slavery to all our employees. This e-learning module is compulsory for all our employees to complete and it gives them an overall understanding of what modern slavery is, some key indicators and issues to look out for and what to do if they are concerned. The current completion rate for the e-learning module is 91.6%. We monitor this regularly to improve compliance.

We took the opportunity this year to update the e-learning module, given that it was already three years old. As a partner of the Supply Chain Sustainability School, we have used some of the material produced through the School and incorporated it into our specific e-learning module.

Online portal for modern slavery

One of our Objectives for the BES 6002 Verification for 2019-2020 was to develop an online portal on our internal intranet which could act as an information portal for employees on modern slavery.

This has been achieved and includes a range of information on topics such as:

- The Modern Slavery Act 2015
- Informing employees on the actions that SRM is taking, e.g. supply chain assessment programme
- The GLAA Construction Protocol that SRM continues to be a member of
- The Ethical Labour Sourcing Standard, BES 6002
- Learning and information resources

Supply chain training

As a founding partner of the Supply Chain Sustainability School (SCSS), we worked with the SCSS this year to deliver a webinar to our supply chain partners on modern slavery.

The in-depth webinar took place over two hours and was a means by which attendees could understand what modern slavery is, the extent of it, how it effects construction and what they could do to start tackling the risk of it. We had over 90 attendees to the webinar including some of our own employees who were keen to learn more.

As this first webinar was a general one covering many aspects of modern slavery and the Modern Slavery Act 2015, we followed it with a specific online training workshop on Due Diligence in December 2020.

Industry collaboration

We continue to be a signatory to the Gangmaster and Labour Abuse Authority (GLAA) Construction Protocol.

We believe that while all individual businesses have an important and vital role to play to tackling modern slavery, the collective effort of our industry is key to lasting and sustained action and change. Despite the disruption of this year, we continue to take part in events (albeit remotely) that focus on modern slavery.

This included a webinar in August hosted by The Major Projects Association (MPA) which focused on 'Eliminating modern slavery in major projects'. We provided some insight into the actions we had taken to date and the lessons learned.



Looking ahead into 2021, we will progress the work we are already doing and work further with our supply chain partners to tackle the risks and implement lasting, positive change.

This is our fifth Modern Slavery and Human Trafficking Statement and has been written in accordance with Section 54 of the Modern Slavery Act 2015. The Statement is wholeheartedly supported and approved by the Executive Board on 24th February 2021.

Signature



Paul Hamer
Chief Executive

Date: 24th February 2021

Signature



Steve Hudson
Group Commercial Director

Date: 24th February 2021

Proudly building Britain's future heritage

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