

# Modern Slavery Statement 2023

**BAM UK & Ireland**



**Collaborating across the industry to tackle modern slavery, together.**

## Modern Slavery Transparency Statement

BAM UK & Ireland is an operating division of Royal BAM Group n.v. comprising BAM Nuttall Limited, BAM Construct & Ventures UK Limited, BAM Contractors Limited and their subsidiaries.

This statement is applicable to all BAM UK & Ireland legal entities.

Section 54 of the UK Modern Slavery Act states that all UK businesses with a global annual turnover of £36 million must report on the steps they are taking to tackle modern slavery. This statement has been published in accordance with the Modern Slavery Act 2015 (the Act). It sets out the steps taken across the BAM UK & Ireland division by the legal entities stated above and their subsidiaries during 2023 to prevent modern slavery and human trafficking in its business and supply chains. This statement has been reviewed and approved by the Divisional Chief Operating Officer, John Wilkinson and by the boards of BAM Nuttall Limited, BAM Construct & Ventures UK Limited and BAM Contractors Limited. It has been signed by the Chief Operating Officer and a director of each of the three named entities.

In preparing this statement and considering our plans, the potential impacts of worldwide crises have been considered, including interest fluctuations, UK & Ireland cost of living crisis and the conflict in 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

The Royal BAM Group nv is a construction and civil engineering enterprise operating in Europe and internationally employing more than 13,000 people.

On 1 January 2022 Royal BAM Group changed its organisational structure to two geographic divisions. BAM UK & Ireland Division employs more than 6,500 people operating in four segments: Civils, Construction, Ireland and Ventures.

BAM UK & Ireland division is supported by divisional enabling services, including Delivery Assurance which includes supply chain management and procurement. This has benefitted BAM UK & Ireland by offering greater collaboration and leveraging knowledge sharing which will benefit our approach to stamp out slavery.

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 positive impact on all aspects of sustainability from decarbonisation to biodiversity to social value. Our commitments in the short, medium and long term are set out in our Sustainability Strategy, that was launched in January 2023.

The 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.

We strive to enhance people's lives across communities where we operate. This includes the way that BAM is involved in tackling modern slavery in the civil engineering and construction industry – going above and beyond what we are asked to do to help make a difference.

BAM UK & Ireland 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 that 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; and
- ➔ conduct our business with the highest regard to ethical and environmental standards.

We are committed to ensuring that all our employees and third parties performing services for or on our behalf and / or our joint venture partners abide by the highest professional and ethical standards.





## 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 leading delivery on projects'.

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

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

The BAM UK & Ireland supply chains are large due to the complexity, work scope and geographical spread of our projects. To meet our customers' needs we have a diverse supply chain and in 2024 we worked with approximately 5,000 vendors. This comprises approximately 2,300 suppliers and 1,200 subcontractors. Across UK we spent £1.325 billion and €315 million directly with the supply chain in 2023. As many of our major infrastructure projects are delivered in collaboration with joint venture partners, our true supply chain spend was considerably more. In general terms our supply chain spend represents approximately 75-80% of BAM UK & Ireland turnover; this clearly demonstrates the importance of our supply chain and we endeavor to work with a supply chain that has similar values to ourselves.

**Of further significance is that in excess of 28% of UK supply chain spend was with our BAM Link vendors.**

BAM's general philosophy is not to spread our spend and resource amongst a large number of companies but to instead focus our efforts on a smaller number of key businesses, ensuring we understand their business and they have the ability and willingness to align their current and future strategy with ours, this is managed through our BAM Link approach; a new agreement with our supply chain partners called BAM Link, which suits a diverse group of businesses.

BAM Link offers a great deal of flexibility and provides for longer or shorter agreements depending on the requirements of the supply chain partner. It also allows for the incorporation of existing agreements already concluded with Royal BAM Group.

This approach is designed to have collaboration and alignment to our values as their core element. They are all supported by health and safety, bribery and corruption, modern slavery and other relevant company policies and incorporate ISO44001.

Early engagement, collaboration and on-going performance measurement are key to this approach.

We recognise the potential impact that modern slavery can have on our complete supply chain and their individual suppliers and we ensure that our BAM Link vendors and higher risk members of our supply chain adopt a stringent approach to raising awareness and actively manage Modern Slavery in their own supply chains.

## Materials and goods

We consider ethical and sustainability criteria when sourcing materials and goods and work with our customers to assist them in selecting sustainable and ethically sourced products. When we provide design services, or procure materials and goods directly, we specify to industry standards for responsible and sustainably sourced / produced materials.

This includes timber to FSC / PEFC standards and 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. BAM UK & Ireland has also mandated the use of HVO fuels throughout the business in 2023.

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. The BAM UK & Ireland Modern Slavery Policy Statement further ensures a robust policy-based approach to tackling modern slavery.

## Subcontractors and service providers

We use trade subcontractors, temporary labour, recruitment agencies, design consultants and other specialists to find the skills to help us meet our business needs and demands. Specialist trade subcontractors will often source and supply their materials and goods. In this scenario, we insist on sustainable and ethical standards that comply with our policies and compliment our values.

## Hotspots and risks of exploitation

The main risks identified are contractor-supplied materials sourced outside the EU and using low-skilled or migrant labour inside and outside of the EU.

From this work, we identified several categories of spend for further assessment and engagement. We will build on our experience developing 'Trade and Labour' and 'Operated Plant' Category Management Plans to understand better the implications of modern slavery across our supply chain.

In the UK, we complete the online UK Government Modern Slavery Assessment Tool ('MSAT') each year to assess gaps in our modern slavery programme and support a strategy for future aims.

As many strategic customers review MSAT outcomes, we can improve alignment with our partners, sharing values and goals. The MSAT has helped us focus on specific hotspots and risks of exploitation, highlighting safeguards we can implement to mitigate risk.

We have used 'MSAT' outcomes to refresh BAM UK & Ireland's action plan for achieving our objectives, e.g. by using the MSAT expected outcomes in our evaluation for temporary labour usage in BAM Nuttall we have ensured a robust preferred list of labour suppliers who adhere to modern slavery requirements, anti-bribery and corruption and compliance frameworks.

We continue to learn about potential risks from partners, clients and our supply chain and will continually evolve our approach to identify and take action. We also continue to work with our preferred suppliers to establish long-term and collaborative relationships to identify risks and agree on measures to prevent modern slavery.

We intend to continue working with our peers, suppliers and regulators to share information and intelligence to improve our and across-industry understanding of where modern slavery risks could arise. We will update our risk assessment over time and report back on findings and actions taken.



## What we did in 2023 and what we plan to do in 2024

We made good progress with our actions planned for 2023, however we recognise that we need to continue our journey and focus on the three key areas to stamp out slavery:

- ➔ industry engagement
- ➔ education
- ➔ compliance

Our action plan based on the MSAT outcomes helped us identify our objectives for 2024.

Adapting to agile working continues to challenge face to face engagement but we remain committed to continuously improving our relationships by raising awareness and sharing knowledge with our partners and improving our own learning

Full details of our 2023 successes and our objectives for 2024 are as follows:

### Industry engagement

BAM UK & Ireland considers industry engagement to be a fundamental component in the drive to stamp out slavery. By engaging with our supply chain and wider industry, we aim to improve knowledge sharing and develop broader anti-slavery measures.

We made good progress for the goals we set for ourselves and in 2024 we will increase collaboration across BAM's UK & Ireland Division to stamp out modern slavery.

2023	2024
<ul style="list-style-type: none"> <li>➔ We attended / hosted a number of supply chain events including 'meet the buyer' events.</li> <li>➔ We worked closely with key experts across our UK &amp; Ireland division to improve our supply chain awareness.</li> <li>➔ We identified 20 trades to focus on to develop risk assessments and allocated a category manager to each.</li> <li>➔ We hosted a supply chain management and procurement event cascading the supply chain strategy to all procurement professionals in the business which included sustainability and social value targets alongside modern slavery and compliance requirements.</li> </ul>	<ul style="list-style-type: none"> <li>➔ We will continue to collaborate across our UK&amp;I division to collaborate and learn from each other and our supply chain partners.</li> <li>➔ We will plan Divisional Supply Chain events to educate and raise awareness of modern slavery.</li> </ul>

**KPI: Host a Divisional Supply Chain event with Modern Slavery compliance awareness and focus.**

### Education

BAM UK & Ireland considers education a fundamental component in the drive to stamp out slavery. Through education, in our business and across our supply chain, we aim to promote awareness for and reporting of all suspected incidents of modern slavery.

2023	2024
<ul style="list-style-type: none"> <li>➔ We rolled out the refreshed BAM Code of Conduct and mandatory training module, achieving a 94% completion rate for our Code of Conduct module.</li> <li>➔ We completed a review of our in house training and awareness tools and commenced work on a new Divisional modern slavery elearning module.</li> <li>➔ We started work on a communications plan to further increase awareness around modern slavery and the actions we are taking.</li> <li>➔ We created a Divisional Modern Slavery Information hub on our intranet, to provide a range of resources that all of our sites and offices can use, such as posters, toolbox talks, videos and workshop materials.</li> </ul>	<ul style="list-style-type: none"> <li>➔ To ensure a minimum of 95% of all UK &amp; Ireland employees complete Code of Conduct training.</li> <li>➔ Promote awareness of modern slavery with a communications campaign.</li> <li>➔ Create a divisional eLearning modern slavery module.</li> <li>➔ Consider implementation of site based induction materials.</li> </ul>

**KPI: Communicate UK & Ireland awareness campaign ahead of Modern Slavery Day.**

### Compliance

BAM UK & Ireland considers compliance a fundamental component in the drive to stamp out slavery. By determining controls, prequalification checks and audits in our business and our supply chain, we aim to continually improve the effectiveness of our measures to prevent modern slavery.

2023	2024
<ul style="list-style-type: none"> <li>➔ We created and implemented a division wide modern slavery policy.</li> <li>➔ We moved to a harmonised approach of vendor onboarding across UK &amp; Ireland; a single, industry recommended tool.</li> <li>➔ We amended our sub-contractor agreements to include KPIs around modern slavery and compliance.</li> </ul>	<ul style="list-style-type: none"> <li>➔ Supply chain management and procurement are fully embedded as a Delivery Assurance function within BAM UK &amp; Ireland.</li> <li>➔ Commence the development of risk assessments and robust evaluations for category management of the 20 highest risk trades</li> <li>➔ Communicate the BAM Code of Conduct to our supply chain.</li> </ul>

**KPI: Develop risk assessment and evaluation for our identified top 20 trades.**

## Summary

BAM UK & Ireland remains fully committed to stamping out slavery. Our closer collaboration across the UK & Ireland division will further progress our journey to stamping out slavery.

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. These present a risk to modern slaves being exploited in our industry. Our 2024 actions will mitigate these risks in BAM's aim to stamp out slavery.

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, and while our colleagues are at work, but across society and in local communities as they go about their daily lives.

Our supply chain is an intrinsic part of our business. We believe it is essential to engage with all our suppliers and subcontractors.

## Due diligence

We recognise the need to carry out diligent checks as part of our modern slavery action plan for employees. Some examples of how we do this are:

- ➔ Right to work eligibility checks, including questions and guidance for our supply chain partners on how to ensure they employ people legally and combat modern slavery.
- ➔ All BAM employees are given access to modern slavery training

- ➔ Our supply chain engagement process requires all subcontractors and major materials vendors to complete their Construction Line profile, including answers relating to modern slavery, employment of people and sourcing responsibly.
- ➔ We continue to discuss modern slavery as part of our regular relationship-building meetings with our supply chain partners.
- ➔ Through supplier audit sessions, BAM maintains the right to audit and investigate any member of our supply chain and focus on areas of perceived risk.
- ➔ Modern slavery is a consideration when we assess the suitability of potential joint venture partners for the delivery of Major Projects.

We expect all of our people to be involved in the fight against modern slavery. It starts with our Directors, who fully support our Modern Slavery plan and are instrumental in incorporating measures into our strategy and approach to help tackle this.

The Company Secretary of the division oversees compliance with the Modern Slavery Act and develops our Modern Slavery Act Transparency Statement. In collaboration with experts from Compliance, Business Process and Quality, Human Resources, Supply-Chain Management and Procurement and Communications, they ensure our anti-slavery and human trafficking processes and delivery of our plans are robust and meet compliance standards.

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 2023.

**John Wilkinson**  
COO BAM UK & Ireland Division

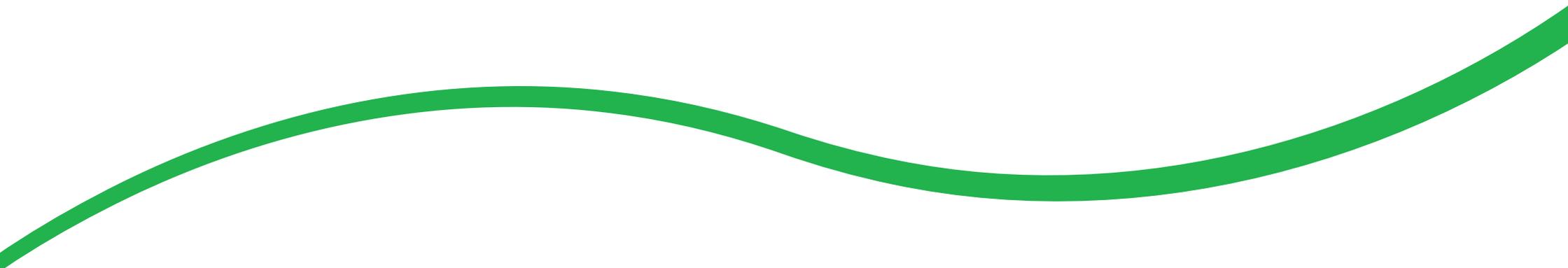
**Huw Jones**  
Executive Director, BAM Nuttall Limited

**Simon Finnie**  
Executive Director, BAM Construct  
& Ventures UK Limited

**Alasdair Henderson**  
Executive Director, BAM Contractors Limited

**28<sup>th</sup> June 2024**

**We're collaborating across the industry to tackle modern slavery, together.**

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