

BAM NUTTALL LIMITED

MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2017

Introduction from the Chief Executive, Steve Fox

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 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 the Royal BAM Group and our ultimate parent company, Koninklijke BAM Groep NV, has its head office in the Netherlands. We have in excess of 2,500 employees and the Group has over 20,000 employees worldwide. BAM Nuttall operates primarily in the UK but collaborates with all parts of the wider BAM Group, including on issues of ethical and responsible business practices.

Our business is organised into 7 business units and we operate in nine sectors. More information about what we do can be found at: <http://www.bamnuttall.co.uk/pg/whatwedo>

Our supply chain

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

Materials & Goods

In selecting where materials and goods are sourced from we review specifications for ethical and sustainability criteria where it is within our ability to do so. Where we provide design services, we specify to industry standards for responsible and sustainably sourced / produced material as outlined in our sustainable business policy.

What we are doing

It is the responsibility of all BAM Nuttall 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 BAM Construct UK 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. 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.
- Held supply chain engagement forums, at which modern slavery was discussed. Approximately 250 separate companies attended during 2017.
- Actively participated in the Supply Chain School Special Interest Group helping to develop industry wide solutions to modern slavery.
- Communicated the importance of modern slavery compliance to all major suppliers through a newsletter
- Introduced new software group wide which helps to identify high risk events to enable improved focus on supply chain risk.
- Undertaken training for the Board of Directors led by an external specialist in modern slavery

During 2018 we are undertaking the following actions:

- 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.
- Holding a focus group with operational (project based) staff to gain feedback on the most effective methods of communicating with staff and supply chain regarding modern slavery risks.
- Developing eLearning and further BAM Specific training and communications for employees, project teams and suppliers.

Due diligence

To ensure all those in our supply chain and contractors share our values we have in place a supply chain compliance programme. This consists of:

- Annual reviews with our tier 1 suppliers
- BAM Link partner agreements allowing greater transparency through partnership working and all BAM Link Agreements include provision for agreement on Modern Slavery policies
- Builders Profile assessment system including elements specifically aimed at modern slavery prevention.

We have appointed the Company Secretary as our Compliance Officer, a role that includes a responsibility to our Board for overseeing compliance with the Modern Slavery Act and annual preparation of the Modern Slavery Act Transparency Statement. Our Business Process and Quality, Human Resources and Procurement departments are also involved with ensuring the robustness of modern slavery and human trafficking compliance within BAM Nuttall.

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 31st December 2017.

A handwritten signature in black ink, appearing to be 'S C Fox', with a long horizontal line extending to the right.

S C Fox
Chief Executive
BAM Nuttall Ltd
28 June 2018