

## BAM UK & Ireland

### Modern Slavery Policy Statement

BAM UK & Ireland is an operating division of Royal BAM Group n.v. and consists of four business segments: BAM Construction, BAM Nuttall, BAM Ventures and BAM Ireland.

This policy is applicable to all BAM UK & Ireland activities. We are committed to maintaining the highest standards of ethics and integrity in the conduct of our business.

Slavery and human trafficking are crimes and a violation of human rights. We have a zero-tolerance approach to slavery and human trafficking.

Slavery and human trafficking involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain and encompasses practices such as: forced labour (i.e. involuntary work coerced by threatening behaviour); the sale and exploitation of children and other vulnerable groups; and arranging or enabling the trafficking of persons.

The following key principles apply to our business and suppliers:

- child (under 16 years of age) labour must not be used and we and our suppliers must not benefit from child labour
- any form of forced or compulsory labour must not be used and we and our suppliers must not benefit from forced or compulsory labour. Workers must be free to leave employment or work after reasonable notice
- passports must not be taken from workers
- all forms of debt bondage are prohibited
- workers must not be subject to contracts that tie them into repaying a loan, accommodation or some other costs that they have little opportunity to repay
- compensation and benefits must comply with fundamental principles relating to minimum wages, overtime hours and legally mandated benefits
- the formation of trade unions and powers of collective bargaining must be respected
- workers should have safe and healthy working conditions that meet or exceed applicable standards for occupational safety and health
- assess the risks of modern slavery and human trafficking and carry out due diligence on suppliers

We are committed to implementing and enforcing effective systems and controls to ensure slavery or human trafficking are not taking place anywhere in our own business or in any of our supply chains.

This policy is achieved by effective operation of our integrated management systems together with the active leadership, participation, professionalism and commitment of all personnel. The management systems aim to meet the requirements of the division, our clients and other interested parties.

The Divisional Leadership Team regards the responsibility of management in implementing this policy statement to be fundamental to BAM UK & Ireland Division meeting its standards and commitments.

Executive Directors are responsible for ensuring the implementation of this policy within their area of control.

Our approach provides the framework to set and monitor objectives with key focus on:

#### Awareness

- embed awareness and understanding of modern slavery and how to identify and report potential instances

#### Prevention

- review and understand the changing modern slavery risk areas within the division
- continually identify and develop opportunities to improve our prevention measures in relation to modern

#### Transparency

- annually review and publish our performance in relation to modern slavery

The COO for UK & Ireland has appointed a Compliance Officer to ensure awareness of this policy is promoted throughout the Division, the effectiveness is monitored and areas for continual improvement identified and implemented.

*This policy statement has been approved electronically. Proof of approval can be seen upon request*

**John Wilkinson**  
**Chief Operating Officer**  
**BAM UK and Ireland**

