

# BAM Nuttall

## Modern Slavery Statement 2021



# BAM Nuttall Ltd

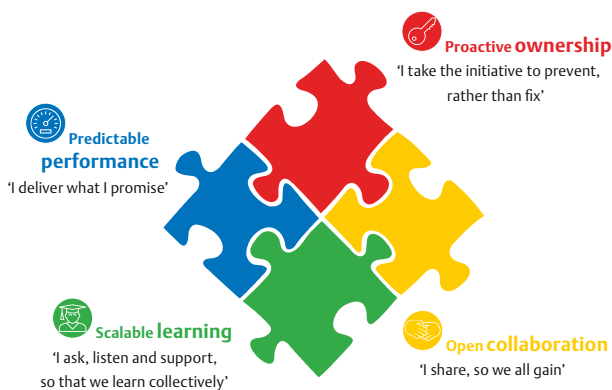
## Modern Slavery Transparency Statement 2021

The BAM Nuttall Directors make this statement on behalf of BAM Nuttall and its subsidiaries for the calendar year 2021. It sets out what we are doing to stamp out slavery and human trafficking in our business and our supply chain, and the progress made since our last statement.

In preparing this statement and considering our plans, the potential impacts of COVID-19 have been considered. It has been over two years since the pandemic began and we can see that the actual impacts of COVID-19 in our world continue to be far reaching and all encompassing. Specifically for modern slavery, we believe there is an increased risk of unfair treatment and low paid workers in our supply chain in the wake of COVID-19.

We have also considered the potential impact of the current conflict in Ukraine. We believe there is an increased risk of unfair treatment and low paid workers in the wake of the conflict.

As a result, extra vigilance is needed to help stamp out slavery.



## Our business and values

BAM Nuttall is a part of the Royal BAM Group nv, a construction and civil engineering enterprise operating in Europe and internationally employing more than 18,000 people globally. BAM Nuttall employs in excess of 3,000 direct employees in the UK. We operate primarily in the UK and have collaborated with our sister company, BAM Construct UK, in developing our approach to stamp out slavery.

On 1 January 2022 Royal BAM Group changed its organisation structure to two geographic divisions. BAM Nuttall is now part of the UK & Ireland Division which employs more than 6,500 people.

The Company undertakes civil engineering works across sectors including rail, road, energy, water, coastal and ground engineering, through three delivery centres – Transport, Major Projects and Regions. More information about what we do can be found at: [bamnuttall.co.uk/work/](https://bamnuttall.co.uk/work/)

We are committed to being a sustainable business and ultimately want to have a net positive impact on climate, resources and people by 2050, as measured against science-based targets.

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, support 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 Nuttall 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'.

BAM Nuttall continues to collaborate with BAM Construct, and other Royal BAM Group Operating Companies to develop together and, where possible, to align business excellence in shared pursuits. Areas that BAM Nuttall and BAM Construct are currently collaborating on include supply chain categorisation and category management. In terms of any joint category management efforts BAM Nuttall and BAM Construct commit to including modern slavery prevention and ethical procurement practices being part of those efforts.

Currently, the BAM Nuttall supply chain is 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 2021 we worked with some 3,600 vendors. This

comprises approximately 2,300 suppliers, 1,100 subcontractors. BAM Nuttall spent £600m approx. directly with the supply chain in 2021. 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 80% of BAM Nuttall turnover; this clearly demonstrates the importance of our supply chain and we endeavour to work with a supply chain that has similar values to ourselves.

Of further significance is that in excess of 20% of supply chain spend was with our BAM Link vendors. BAM Link is an agreement with our preferred vendors which provides a commitment to collaborate to work more closely together in a strategic manner and to have a common focus on ethical business.

We recognise the potential impact that modern slavery can have on our complete supply chain and their individual suppliers, and are initially concentrating our efforts on BAM Link vendors and higher risk members of our supply chain. We have BAM Link agreements with both suppliers of materials and goods and with subcontractors.

## 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 product. When we provide design services, or procure materials and goods directly, we specify to industry standards for responsible and sustainably sourced / produced material.

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.

The BAM Group 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. This is supported by our [Sustainable Business Policy](#) and [Ethical Business Policy](#) which outline our commitments and minimum requirements to procurement and how we conduct our business. These ensure 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's 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.

### **Hotspots and risks of exploitation**

Working with a third party, Action Sustainability, we have completed a Modern Slavery gap analysis ('Gap Analysis'), including a high-level risk assessment of our spending. This identified potential higher risk of modern slavery or issues which may lead to modern slavery, such as low-paid labour in critical trades and categories.

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

From this work, we identified several categories of spend for further assessment and engagement. We'll 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.

More recently, BAM Nuttall completed the online Modern Slavery Assessment Tool ('MSAT') 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've used 'MSAT' outcomes to refresh BAM Nuttall's action plan for achieving our objectives, e.g., a standalone Modern Slavery Policy to engage and manage supply chain relationships.

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 lie. We will update our risk assessment over time and report back on findings and actions taken.



## What we did in 2021 and what we plan to do in 2022

We made good progress with our actions planned for 2021, 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

In addition to the action plan that we implemented following the Gap Analysis, we also have our action plan based on the MSAT outcomes. These helped us identify our actions for 2022.

While COVID-19 continued to disrupt our business in 2021, we committed to engaging our stakeholders, learning and sharing knowledge by attending and organising virtual meetings and industry forums.

Full details of our 2021 successes and our objectives for 2022 follow:



## Industry Engagement

BAM Nuttall considers industry engagement 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.

Despite continued impacts of the Covid pandemic in 2021, we made good progress for the goals we set for ourselves, in our mission to stamp out modern slavery. In 2022 we will increase collaboration across BAM's UK & Ireland Division to stamp out modern slavery.

### 2021

- We started developing risk assessments focused on trades identified in the Gap Analysis.
- We participated in a Supply Chain Sustainability School 'Modern Slavery' event in association with a strategic client. And participated in a Westminster forum on the topic and continued working with Rail Live.
- As a partner of the Supply Chain Sustainability School, collectively with industry peers, we supported development of training modules on sustainability issues, including modern slavery.
- We continued to investigate the link between Builders Profile and Construction Line (BAM Construct prequalification provider) to align our supplier modern slavery requirements.

### 2022

- We will identify trades to focus on to develop risk assessments.
- We will continue to participate in, support and promote industry events, to demonstrate our commitment to stamp out slavery.
- We will develop a unified UK & Ireland approach to Pre-Qualifying Questions (PQQ) stage for modern slavery related requirements and vendor onboarding processes
- We will update our UK Government Modern Slavery Assessment to share progress on our action plans.

**KPI:** We will attend a minimum of three industry events by the end of 2022.

## Education

BAM Nuttall 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.

### 2021

- 82% of monthly employees carried out our in-house online training.
- We published two procurement newsletters to our supply chain, featuring the topic of modern slavery.
- We participated in a series of virtual training opportunities by external solicitors to keep up to date on Supply Chain Compliance.

### 2022

- We will continue to monitor and promote training to maintain a minimum 80% completion by our employees.
- We will review and, if appropriate, update our in-house learning.
- We will develop and implement a communications plan to further increase awareness around modern slavery and the actions we are taking.
- We will consider introducing a 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.

**KPI:** Deliver one modern slavery specific supply chain communication to increase awareness of challenges and how we can work together to stamp out slavery.

## Compliance

BAM Nuttall 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.

### 2021

- We evaluated the need for materials vendors to undertake a full vendor registration.
- We started working on a response protocol, providing minimum requirements for site teams and guidance on what to do in the event a case of modern slavery is identified.
- We planned and completed a modern slavery audit with a site security provider, including an assessment of the management of their supply chain.

### 2022

- We will continue to ensure that materials providers are required to provide responses to modern slavery questions in their PQQ's.
- We will consider the need for a separate modern slavery policy and implement if required.
- We will continue our work on a response protocol.
- We will evaluate the need for materials vendors to undertake a full vendor registration.
- We will plan and execute further modern slavery audits with high risk suppliers in both security services and the temporary trades and labour categories.
- We will review our current standard sub-contractor contractual agreements to ensure they adequately protect against modern slavery risk.

**KPI:** We will complete a minimum of four audits on security and trades and labour providers.



## Summary

BAM Nuttall remains fully committed to stamping out slavery.

The residual effects on employment following COVID-19 continues to be a risk to modern slavery. And the current conflict in Ukraine presents a further risk to modern slaves being exploited in our industry. Our 2022 actions will mitigate these risks.

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 Nuttall employees are given access and time to complete our online modern slavery training as part of their induction and refresher training throughout their careers.
- Our supply chain engagement process requires all subcontractors and major materials vendors to complete their Builders 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.

- Supplier audit sessions. BAM Nuttall 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 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, 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 2021.**



**Ian Parish, Executive Director**  
BAM Nuttall Ltd  
June 2022





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