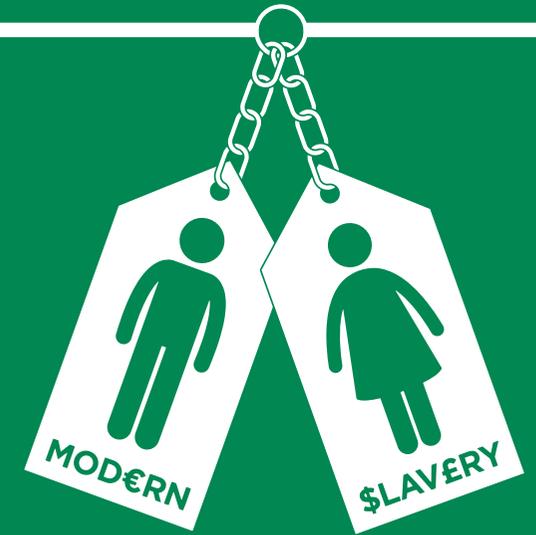




# MODERN SLAVERY STATEMENT 2020-2021



## INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes FM Conway's slavery and human trafficking statement for the financial year ended 31 March 2021. It covers the activities of FM Conway and its wholly owned subsidiaries. We are committed to achieving the highest level of ethical standards and implementing sound governance arrangements to ensure integrity and objectivity in our business activity. We embrace the principles of fairness, inclusion and respect in everything we do.



**SPEAKOUT**

SpeakOut App  
[www.fmconway.co.uk/speakout](http://www.fmconway.co.uk/speakout)  
or call anonymously on **0808 169 1521**



C A R E · I N N O V A T I O N · I N T E G R I T Y · E X C E L L E N C E

## OUR BUSINESS

[FM Conway](#) is a leading infrastructure services company delivering vital services in transportation, the built environment and open spaces for communities and business. We undertake our services through our self-delivery model and combining our in-house Consultancy Services team with frontline operational excellence, we inspect, design, build, enhance and maintain essential infrastructure services for the community.

The company's turnover (*including its subsidiaries*) for the year ending 31 March 2021 was £338 million.

## OUR SUPPLY CHAIN

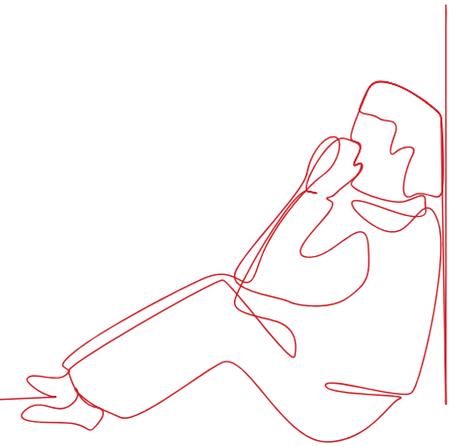
FM Conway uses a wide range of suppliers who supply goods for sale and/or who provide services to our business and our customers. We have in excess of 1500 suppliers and subcontractors supporting our business that are predominately (99%) based in the UK. Of FM Conway's direct spend in 2020/21 less than 0.02% was spent with suppliers in high-risk countries of origin (countries being determined as high risk by the Global Slavery Index).

All new agreements with companies providing subcontracted labour to FM Conway include an anti-slavery provision, including the right to audit a vendor's books and processes to ensure the vendor is compliant with all relevant laws and regulations. In 2021, our purchase order terms and conditions were updated to include an anti-slavery clause and it is company policy to have a PO in place prior to commencing any work with subcontractors.

We have regular review meetings with suppliers identified, through our risk assessments, as higher risk.



International  
Labour  
Organization



## OUR POLICIES

We are committed to ensuring that there is no modern slavery, child labour or human trafficking in our supply chains or in any part of our business. Our Code of Conduct reflects our position of zero tolerance of modern slavery and human trafficking in any form and reinforces our commitment to acting ethically and with integrity in all our business relationships.

Our Modern Slavery Policy requires all of our suppliers to adhere to the standards set out by the International Labour Organisation's Conventions 138 and 182 as regards the employment of children and young people. We may terminate our relationship with suppliers and other business partners if they breach this Policy and they will be reported to the Modern Slavery Helpline and the NSPCC or other appropriate local NGO to ensure the safety of the child. We would only continue our business relationship if the supplier actioned a remediation plan to develop responsible solutions in the best interests of the child, including enabling access into education, and evidenced this.

We are working on a new Supplier and Contractor Code of Conduct setting out our specific expectations for all current and prospective suppliers and subcontractors, to reinforce the company's commitment to be free from force, bonded or compulsory adult or child labour throughout our supply chain, with a view to embedding it in 2022.

Our Ethical and Sustainable Procurement Code sets out our standards with respect to buying goods and services; as well as detailing requirements with respect to human rights, child and forced labour and modern slavery, this forms part of our contractual relationship with our suppliers.

We are committed to achieving the highest level of ethical standards and strive to ensure integrity and objectivity in our business activity. It is the company's responsibility to provide employees and members of our supply chain with a safe and confidential mechanism to raise concerns and report breaches of our standards, processes or protocols. Our Whistleblowing Policy provides a mechanism for our employees to report any concerns or suspected breaches of our policies.

Our [Speak Out](#) helpline and app enables employees and others to raise any concern or to seek advice on a matter related to compliance with the law, our published business ethics and our company Code of Conduct directly with the business. Our helpline is for all employees and for third parties with whom the company has a business relationship (including employees, contractors, customers, suppliers and agents) if they observe wrongdoing or wish to raise concerns.

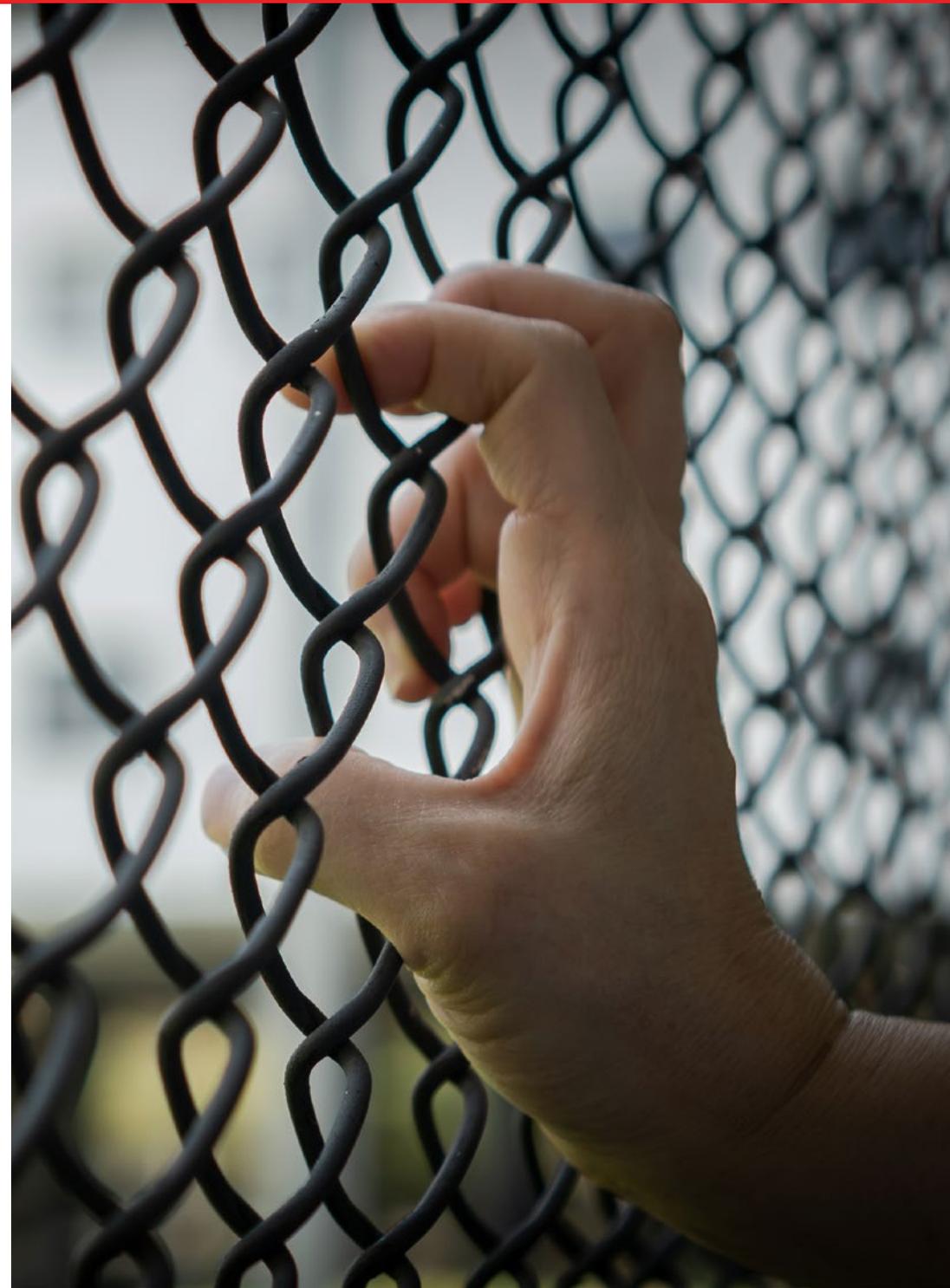
## DUE DILIGENCE AND RISK ASSESSMENT PROCESSES

We carry out detailed due diligence checks on our supply chain, to include reviewing for risks of modern slavery and human trafficking. We have systems to identify and assess any area of potential risk of transgression of our business ethics in our own company and our supply chains, and to protect whistle blowers.

Our Internal Audit department annually review our approach to compliance with the [Modern Slavery Act 2015](#) and to date, this testing has not highlighted any red flags that indicate modern slavery is present in our workforce or supply chain.

Should any future audit elicit evidence of non-compliance with the standards we have established, we will support our suppliers to achieve improvement and adherence to our key performance indicators; in some cases, we accept that this may not be possible, and our business relationship may need to be brought to an end and the organisation be removed from our approved supplier list.

To safeguard the welfare of our directly employed and subcontractor workforce, we take steps to ensure that any potentially suspicious or concerning matters that come to light – for example, employees requesting payment of their wages into a back account that is not their own, or multiple employees living at the same address – are fully investigated.



## TRAINING AND STAFF AWARENESS

Annual Modern Slavery training is mandatory for all employees at every level of the organisation. An e-learning module is available to all, and Toolbox Talks are delivered to frontline staff to ensure that training reaches anyone without the equipment or ability to participate electronically.

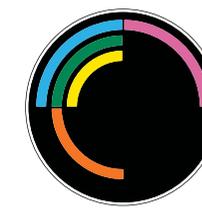
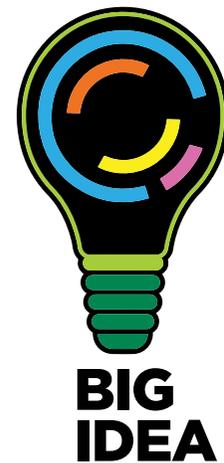
Our labour-only subcontractors also receive training via Toolbox Talks in their induction. All training materials are regularly reviewed and will be updated when changes in legislation are made, with employees then asked to complete the latest version of training. In 2021 we successfully rolled out a new, app-based version of the Toolbox Talk, which will enable real-time recording of training delivered and assist us in the generation of statistics that tangibly demonstrate our compliance.

Our fixed sites and mobile welfare units display visual materials highlighting the 'Signs to Spot' for modern slavery to raise awareness and promote how workers can report any concerns via our company Speak Out helpline. These materials are translated into Romanian, Polish, Albanian and Lithuanian to ensure key material relating to modern slavery is accessible to non-English speaking workers.

We have three alternative methods by which employees are able to raise any potential queries or suspicions if they feel Speak Out is not the best medium. Our SHEQ department will investigate concerns that are flagged to them via either the Near Miss reporting or Non Conformance Reporting procedures. Our Human Resources team can also ensure proper investigation of anything raised through the Big Idea suggestion scheme.

We will continue to look at other methods and media that will deliver our anti-slavery message.

MODERN SLAVERY KNOW THE SIGNS	WSPÓŁCZESNE NIEWOLNICTWO ROZPOZNAJ ZNAKI	SCLAVIA MODERNĂ CUNOȘTE SEMNELE
<p><b>SLAVERY IS CLOSER THAN YOU THINK. IT HAPPENS ALL OVER THE WORLD, INCLUDING THE UK, BUT IS JUST OFTEN OUT OF SIGHT.</b></p> <p><b>YOU COULD SAVE SOMEONE FROM SLAVERY JUST BY SPOTTING THE SIGNS AND REPORTING YOUR CONCERNS.</b></p>	<p><b>NIEWOLNICTWO JEST BLIŻEJ NIŻ MYŚLISZ. ZDARZA SIĘ NA CAŁYM ŚWIECIE, RÓWNIEŻ W WIELKIEJ BRYTANII, ALE CZĘSTO JEST NIEWIDOCZNE.</b></p> <p><b>TY MOŻESZ URATOWAĆ KOGOŚ OD NIEWOLNICTWA POPRZECZ UMIEJĘTNOŚĆ ROZPOZNAWANIA ZNAKÓW I ZGŁASZENIE SWOICH OBAW</b></p>	<p><b>SCLAVIA ESTE MAI APROAPE DECÂT CREZI. SE ÎNTÂMPLĂ PESTE TOT ÎN LUME, INCLUSIV MAREA BRITANIE. DAR NU ESTE ÎNTOTDEAUNA OBSERVATĂ IMEDIAT.</b></p> <p><b>PUTEȚI SĂ SALVAȚI O PERSOANĂ DE LA SCLAVIE DOAR PRIN RECUNOȘTEREA SEMNELOR ȘI RAPORTAREA ACESTORA.</b></p>
<p><b>KNOW THE SIGNS</b></p> <p><b>APPEARANCE</b> - Do they appear withdrawn, malnourished or unkempt?</p> <p><b>TIME</b> - Are they unable to travel alone or perhaps travel at unusual times?</p> <p><b>MANNER</b> - Do they avoid eye contact or appear hesitant to talk?</p> <p>If you have witnessed any of these behaviours, or are a victim yourself, you can report it confidentially now:</p>	<p><b>ROZPOZNAJ ZNAKI</b></p> <p><b>WYGLĄD</b> - Czy osoba robi wrażenie zamkniętej w sobie, niedożywionej i zaniedbanej?</p> <p><b>CZAS</b> - Czy zawsze ktoś towarzyszy im w podróżach, czy podróżują w nietypowych porach dnia?</p> <p><b>SPOSÓB</b> - Czy unikają kontaktu wzrokowego lub rozmów?</p> <p>Jeśli byłeś świadkiem ktoregokolwiek z tych zachowań lub sam jesteś ofiarą niewolnictwa, możesz to teraz zgłosić poufnie:</p>	<p><b>CUNOȘTE SEMNELE</b></p> <p><b>ASPECT</b> - Apar retrasi, subnutriți sau neingrijii?</p> <p><b>TIMP</b> - Sunt incapabili să călătorească singuri sau călătoresc la ore neobișnute?</p> <p><b>COMPORTAMENT</b> - Evită contactul vizual sau ezită să comunice?</p> <p>Dacă ai sesizat vreunul dintre aceste comportamente sau sunteți dvs o victimă a sclaviei moderne, puteți raporta confidențial acum:</p>
<p>0808 169 1521   <a href="http://www.modernslavery.co.uk">www.modernslavery.co.uk</a>   <a href="http://www.fmconway.co.uk/speakout">www.fmconway.co.uk/speakout</a></p>		

## PUBLIC AWARENESS

All of our mechanisms for raising concerns about slavery - [Speak Out](#), [Near Miss](#) and the [Big Idea](#) - are outward-facing and open to any member of the public should they notice anything on our sites that they believe may be in need of investigation.

<https://www.fmconway.co.uk/contact-us>



## Contact us

Visiting us? Use our interactive map above to plan your journey.



Have we left something behind? Let us know!

[Click here to report left items](#)



If you think something isn't right, please tell us about it.

[Click here to submit your complaint](#)



Tell us about anything you think we could change or do differently and we'll give your idea some thought.

[Click here to submit your Big Idea](#)



Near Miss reporting lets us identify and prevent potential accidents. Keep talking – if you see something that isn't safe, tell us about it.

[Click here to submit your Near Miss](#)



We are committed to achieving the highest level of ethical standards and strive to ensure integrity and objectivity in our business activity.

Reporting a concern through Speak Out gives you the opportunity to make the report in confidence and without fear of retaliation. It also provides the Company an opportunity to investigate and take appropriate action to ensure the Company's long-term success.

[Click here to Speak Out](#)

## MONITORING OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We are a signatory to the Gangmasters & Labour Abuse Authority Construction Protocol and improved our whistleblowing process to ensure that it is accessible to a wider audience, both internally and externally through our Speak Out helpline and application.

As part of our ongoing commitment to combating modern slavery, child labour and human trafficking, our Internal Audit department complete an annual audit of modern slavery and consider modern slavery as part of their audit planning process for all engagements, including a review of our procurement processes across the organisation, to highlight any potential risks and mitigating actions concerning modern slavery.

With effect from the start of our 2021/22 financial year we have introduced a suite of Key Performance Indicators (KPIs) that will enable Internal Audit to evaluate the effectiveness of these actions:

### Modern slavery training conducted

It should be noted that the COVID-19 pandemic significantly disrupted our learning and development interventions as a whole, and modern slavery training was unfortunately no exception. We anticipate performance to be significantly improved in the 2021/22 financial year.

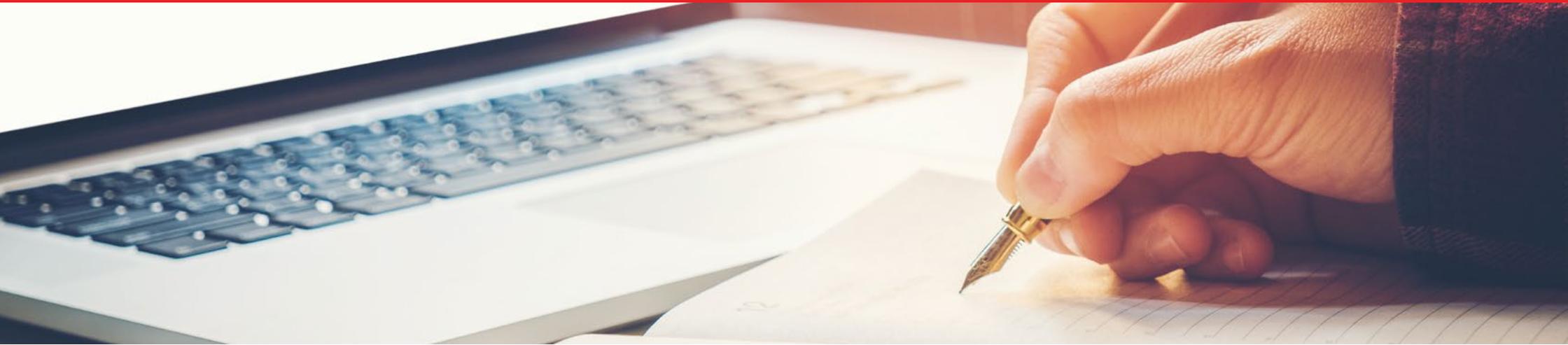
Measure	Target	Achieved FY 2020/21
Number of new starters trained in year 1 - PAYE	100%	70.56%
Number of new starters trained in year 1 - LOSC	100%	59.26%
Number of PAYE employees with over one year's service trained	90%	84.4%
Number of LOSC with over one year's service trained	90%	66.91%

### Monitoring and workforce engagement

Number of home address checks identified as needed	On hold due to COVID-19
Number of home address visits conducted	On hold due to COVID-19
Number of modern slavery incidents/ concerns identified	Nil
Number of on-site checks identified as needed	On hold due to COVID-19
Number of on-site checks conducted	On hold due to COVID-19
Number of modern slavery incidents/ concerns identified	Nil
Site visits conducted to raise awareness of Modern Slavery and reporting mechanisms	6

### Policy review and audit

Modern Slavery policy reviewed and updated for the forthcoming year	Yes
Annual risk assessment conducted	Yes
Number of 'red' actions identified	Nil



## OUR JOURNEY

We understand that the risk of modern slavery and human trafficking is not static, and we must continue to improve our mitigation in the years ahead to ensure the company is alert to, and acts upon, emerging industry risks. As part of our continued commitment to improving compliance with the Modern Slavery Act 2015 we will continually monitor and review our policies, our supply chain activities, and our staff training and awareness programmes through a cross-departmental working group set up explicitly for this purpose.

### **Actions that the group intends to commit to in 2021/22 will include:**

- Introducing a more-in depth level of modern slavery training for anyone involved in procurement or in the management of contracts that use subcontracted labour
- Introducing a targeted questionnaire for completion by suppliers that our assessments have identified as particularly high-risk, in which we will explore in depth their commitment to driving out modern slavery through their policies, supplier relationships, compliance and monitoring mechanisms, and training. Findings will be evaluated by our Internal Audit department
- Improving supplier engagement and enabling greater awareness within our supply chain of FM Conway's stance on modern slavery. This is through email communications, sent with monitored recipient engagement that we can report on and learn from, offering support and education to suppliers that are interested in learning more about FM Conway's expectations and our own modern slavery/trafficking avoidance plans and actions
- Further improving our direct workforce communication regarding modern slavery, finding new methods to raise awareness of the issue and the mechanisms we have for reporting any concerns
- We intend to publish our annual modern slavery statement voluntarily on the Government website in advance of it becoming a mandatory practice, as a demonstration of our commitment to identifying and eradicating slavery, child labour and trafficking, which has no place in our industry or any other



## **APPROVAL**

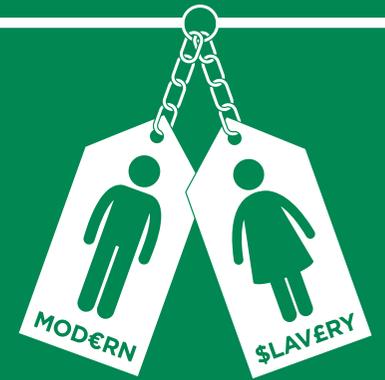
This statement has been approved by the Board of FM Conway and is signed on its behalf.

A handwritten signature in black ink, appearing to read "Adam Green".

Adam Green  
Chief Executive Officer

1 Subsidiaries: F.M. Conway Building and Maintenance Limited; Conway Minerals Limited; Hawbury Cleansing Limited; The London Paving Company Limited; Heathrow Asphalt Limited; Berkshire Macadams Limited; Hampshire Macadams Limited; United Construction Materials Limited; United Asphalt Limited; United Asphalt (Theale) Limited; United Asphalt (Croydon) Limited; United Asphalt Contracting Limited; United Concrete Limited; Imperial Bitumen; 4 Vector Limited.

# MODERN **SLAVERY STATEMENT** 2020-2021



## **CARE**

As a family business we act with care and compassion



## **EXCELLENCE**

Great people delivering great work, always



## **INTEGRITY**

A business committed to doing the right thing



## **INNOVATION**

Our passion is to always find a better way