

# Modern Slavery Statement

## Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes F M Conway's slavery and human trafficking statement for the financial year ended 31 March 2020. It covers the activities of F M Conway Ltd and its wholly owned subsidiaries<sup>1</sup>. We are committed to achieving the highest level of ethical standards and to 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.

## Our Business

F M 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 front line operational excellence, we inspect, design, build, produce, enhance and maintain essential infrastructure services for the community.

The company's (including its subsidiaries) turnover for the year ending 31 March 2020 was £325.7 million.

## Our Supply Chain

F M 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 2019/20 less than 0.05% 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 F M 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 regulation. In 2020, our purchase order terms and conditions have been 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.

## Our Policies

We are committed to ensuring that there is no modern slavery 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.

In 2020 we will be issuing a 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 labour throughout our supply chain.

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 application 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 Process

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 completed a review of our approach to compliance with the Modern Slavery Act 2015 and this testing did not highlight any red flags that indicated modern slavery was present in our workforce or supply chain.

Where our audits 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.

## Risk Assessment

We are aware that risks can arise from modern slavery and human trafficking from all aspects of our business, notably through our recruitment practices (including subcontracted employees), operational site management and supply of materials. We carried out a risk assessment on our supplier and subcontractor supply chain to ensure that they are compliant with the Modern Slavery Act, and will be executing this exercise annually to ensure our understanding of all risks is fully up to date. Where issues are identified (including through our audit processes) that are not resolved to our satisfaction, we will review the on-going nature of the relationship. Appropriate actions are taken, including but

not limited to, the removal of any non-compliant organisations from our approved supplier list where there are issues identified that remain unresolved.

## **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 front-line staff to ensure that training reaches anyone without the equipment or ability to participate electronically. Completion of this mandatory training is reviewed monthly. Our labour-only subcontractors also receive training via Toolbox Talk 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 plan to roll 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 promotes how workers can report any concerns via the company Speak Out helpline. These materials are translated into Romanian, Polish and/or Lithuanian to ensure key material relating to modern slavery is accessible to non-English speaking workers.

In 2020 and beyond, we intend to further drive awareness by adapting our existing internal communications materials to incorporate more information on the 'Signs to Spot', ensuring colleagues at all levels have the knowledge to enable them to identify and assist a co-worker at risk of harm.

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 Nonconformance 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.

## **Public Awareness**

All of our mechanisms for raising concerns about slavery - Speak Out, the Near Miss and Nonconformance Reporting procedures, and Big Idea – are outward-facing and open to any member of the public notice anything on our sites that they believe may be in need of investigation. In 2021 we intend to look at ideas for raising public awareness of these reporting avenues, to involve the wider community in our anti-slavery drive.

## **Monitoring our effectiveness in combating slavery and human trafficking**

As part of our ongoing commitment to combating modern slavery 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 our procurement processes across the organisation to highlight any potential risks and mitigating actions concerning modern slavery. In 2021 we intend to look at key performance indicators that will enable Internal Audit to evaluate the effectiveness of these actions.

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.

Our Learning and Development department monitors completion of all mandatory training on a monthly basis and will share these statistics with our management teams with a view to driving compliance across all parts of the business.

## 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 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
- Issuing a 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 labour throughout our supply chain
- We will build on our approach by incorporating information on modern slavery, including details of the 'Signs to Spot' and Speak Out, into our colleague handbook
- Identifying ways in which we can further engage members of the public in reporting any concerns regarding forced labour to us through our existing reporting mechanisms
- We intend to design a set of Key Performance Indicators (KPIs) that will enable Internal Audit to evaluate the effectiveness of our actions.

# Approval

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

A handwritten signature in black ink, appearing to read 'AG', with a stylized, cursive flourish at the end.

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.