

# Modern Slavery and Human Trafficking Transparency Statement 2018

Built for **people**

---

## Global Contractor in Construction

Multiplex has been delivering landmark property and infrastructure assets for over 50 years. We are a leading global contractor with circa 6,000 employees across our Middle East, Canada and Europe operations. We have a collaborative workforce that shares knowledge and applies international best practice across all projects.

Our supply chain is complex, extensive and global. It comprises consultants, subcontractors and suppliers delivering materials, equipment and services.

We publish this statement on behalf of our operations in Europe, the Middle East and Canada.

This is our third Modern Slavery Statement. Multiplex published its first Modern Slavery Statement in June 2016, and since then continues to take further steps to tackle modern slavery in our business and supply chain. Four principles drive our business: Built for People, Built for Precision, Built for Positive Impact and Built for Evolution.

Respecting human rights, promoting ethical labour practices and combatting modern slavery is integral to our culture and principles. We are actively work with local governments, industry bodies, NGOs and our

construction peers to establish a common approach and implement effective measures to tackle modern slavery across the construction industry.

## Key Focus Areas in 2018

- Reviewing our management framework, processes and internal controls to better monitor and remediate modern slavery risks
- Driving and supporting stakeholder collaboration workshops and sessions to increase awareness
- Enhancing our collaborations and partnerships with leading construction industry stakeholders on modern slavery, human rights and worker welfare

---

## Our Policies, Formal Documents and Contracts

At Multiplex, we maintain policies and procedures to set out minimum requirements and promote the highest standards of ethical behaviour and social responsibility. These policies and procedures are regularly reviewed and amended (where required) to ensure we develop and improve. These policies and procedures include:

- [Anti-Slavery and Human Trafficking Policy](#), which sets out our commitment to combatting all forms of modern slavery and human trafficking within our business and supply chain
- [Code of Business Conduct and Ethics](#)
- [Anti-Bribery and Corruption Policy](#)
- [Anti-Slavery and Human Trafficking Charter for Suppliers and Service Providers](#), which sets out requirements for our suppliers and service providers
- [Operation of a toll-free reporting hotline](#)
- Validation of the right to work of all employees and construction workers
- Implementation of high standards of Health and Safety in the workplace for all employees and construction workers on our sites
- The requirement in the UK for key construction materials to be responsibly sourced from suppliers holding certificates such as the Programme for the Endorsement of Forest Certification (PEFC) and the Forest Stewardship Council (FSC) for timber, or BES 6001 (BRE Global’s Framework Standard for Responsible Sourcing)

feedback either directly, through their representatives or anonymously, on issues such as working and living conditions, pay, recruitment processes, among others, as part of our grievance and reporting mechanisms. This feedback is investigated and resolved as appropriate.

Our grievance mechanisms are designed to be open and transparent and in line with the ‘UN Guiding Principles’. We continuously review and test our grievance mechanisms to ensure they are operating effectively. They currently include:

- Reporting hotlines
- Raising awareness via posters, tool box talks, inductions and training
- Drop boxes
- Interviews and focus group meetings
- Audits

## CASE STUDY | UNITED KINGDOM

### Building Responsibly Worker Welfare Principles

Collaboration is essential to achieve best practice in the field of workers’ welfare and rights. In 2018, we continued our leadership of the Steering Committee of Building Responsibly; co-leading and drafting the [Building Responsibly Worker Welfare Principles](#). These Principles were launched in June 2018 and have subsequently been endorsed by seven construction companies as well as companies in the oil and gas sector. Further stakeholder workshops have been hosted in Washington D.C and the UK, at which Multiplex was a key influencer and participant.



## CASE STUDY | EUROPE

### Signatories of the Construction Protocol launched by the Gangmasters and Labour Abuse Authority

In July 2018, Multiplex signed the Construction Protocol to tackle labour exploitation and protect vulnerable workers by sharing information and intelligence, raising awareness in supply chains, and maintaining momentum within the construction industry.

## Formal Documents and Contracts

We educate our people on their employment rights, duties and benefits by ensuring all employees have employment contracts and associated documents (such as working visas) with easy access to Multiplex’s policy and procedures, which are hosted on the internal intranet. Similar to our statement in 2017, we continue to review our standard contract terms to ensure they are relevant and that obligations in relation to modern slavery and worker welfare are embedded within our supply chain.

Multiplex requires compliance (through contractual agreements) with our policies and procedures relating to modern slavery and worker welfare from all subcontractors, suppliers and recruitment agents. We continue to work with and assist our supply chain to implement their own equivalent policies, procedures and systems to identify and manage their own supply chain risks. We aim to foster long-term relationships with our value chain partners, creating an environment conducive to tackling modern slavery and promoting ethical labour practices.

## Grievances and Whistle-blowing

All of our employees and direct supply chain are provided with information on the Multiplex Reporting Hotline in accordance with our Ethics Hotline Policy. All construction workers are encouraged to submit

## Governance, Due Diligence and Risk Management

### Governance

In 2018, Multiplex launched its Global Human Rights Committee reporting into the Executive Board. The Committee is made up representatives from human resources, health and safety, quality, sustainability, commercial, and legal, from across Multiplex's UK, Canada and Middle East businesses. The Committee is governed by a Terms of Reference and tasked with overseeing Multiplex's human rights approach and operational risk management systems. They discuss, consult and disseminate information from each region with a view to driving change, raising awareness and tackling ethical labour and modern slavery issues both internally and externally. This Committee is supported by a UK-specific Modern Slavery Committee, which was established in December 2018.

In the Middle East, Multiplex employs a regional team of Worker Welfare Specialists to enforce, monitor and support the Welfare Management System, addressing the grievances raised by its workforce and the workforce of its supply chains. This team grew in 2018 to ensure all live projects have a dedicated resource to conduct audits, interviews, inspections, training and capacity building with our supply chain.

### Supply Chain Screening and Engagement

We expect our supply chain to embrace our values and support the Multiplex approach to sustainability and being an ethical contractor. In 2018, we continued to implement our pre-qualification questionnaire, which includes questions on modern slavery, human rights and worker welfare, and requires confirmation that subcontractors subscribe to our business ethics for health and safety, environmental and social sustainability requirements. These questions have been shared with the Stronger Together Construction Working Group. In 2018, we also adopted airport-style identification checks on our UK projects to identify potential victims of modern slavery.

Multiplex in the Middle East continues to face high risks and specific regional challenges in relation to modern slavery and a migrant workforce. To meet these challenges, we continue to review and develop our bespoke 'Plan-Do-Check-Act' Welfare Management System (WMS). Over the last twelve months, Multiplex has developed project-based dashboards that allow performance to be reviewed against our policies and procedures. These dashboards have helped us to identify and mitigate high risk grievances relating to:

- Forced labour
- Labour exploitation
- Poor working and living conditions
- Poor terms of employment
- Salary payment issues
- Detained passports
- Poor recruitment practices

### CASE STUDY | MIDDLE EAST

#### Worker Interviews and audits

We have taken steps to ensure we have a detailed methodology to encourage compliance with our region-specific worker Welfare Management System. A key component of our WMS is the audits and interviews conducted by the Worker Welfare Specialists. In 2018, 7,665 worker interviews were conducted using a 360-degree feedback tool to address concerns in areas such as recruitment, salary payment, benefits, and working and living conditions. We also audited 45 of our first tier subcontractors to assess compliance with policies and procedures and identify areas for improvement. We worked closely with these subcontractors and conducted monthly subcontractor committee meetings to address and close out the areas of concern identified.

### Assessment Tools: Supply Chain Audits and Recruitment Agent Due Diligence Audits

Engagement with the supply chain is critical to assessing supply chain risks. We are adopting a more diverse, dynamic and bespoke set of tools to achieve this.

We conduct health and safety and sustainability audits not only on our projects, but also on suppliers and manufacturers. Our due diligence procedures allow us to check and monitor the working conditions of construction workers on our sites and elsewhere in our supply chain to identify any unsafe conditions. These procedures also allow us to monitor the responsible sourcing of key materials against applicable standards, such as the Programme for the Endorsement of Forest Certification (PEFC) and the Forest Stewardship Council (FSC) for timber and timber products in the UK.

Migrant workers account for 90% of the workforce in the Middle East and recruitment between South Asia, Southeast Asia and the Middle East continues to be a key challenge for Multiplex and the wider industry. Multiplex has therefore developed Recruitment Agent Due Diligence Audits, which are supported by operational monitoring and training to better identify, mitigate and control risks arising from recruitment practices with the

potential to put the workforce at risk. We have tried and tested our due diligence tools and shared our recruitment model with our construction peers at workshops and roundtables, as well as with the International Labour Organization (ILO), the Business and Human Rights Resource Centre (BHRRRC) and the Institute for Human Rights and Business (IHRB). Some of our ideas, tools and commentary can be found in the following papers:

- An ILO and Engineers Against Poverty white paper on worker welfare entitled '[Exploratory Study of Good Policies in the Protection of Construction Workers in the Middle East](#)'
- An IHRB article entitled '[Responsible Recruitment: Addressing Gaps in Protections for Migrant Workers](#)'

## Reporting on Key Performance Indicators

In our 2017 statement, we committed to report on several focus areas. The table below details our performance in these areas and our points of action in 2018:

- Supply chain procurement due diligence
- Multiplex has implemented pre-qualification questions across our Middle East and European operations, screening for risks.
- Supply chain operational monitoring
- Recognising the limitations of pre-qualification questions, Multiplex has continued to identify regional specific tools (including audits, worker surveys, and worker representative committee meetings) to support the identification of any issues regarding modern slavery and labour practices. In the UK, we have worked with Achilles to conduct labour audits on 20% of our projects, which has informed our actions for 2019.
- The adoption of analytics in an attempt to capture high risk areas of the business in the ME
- Multiplex has developed a bespoke labour welfare and rights dashboard for the Middle East, capturing 12 key indicators. The dashboard is reviewed on a monthly basis with project teams.
- Grievance mechanisms and access to remedy
- We continue to maintain and strengthen our grievance mechanisms, which have proven successful in the early detection of labour welfare concerns.
- Capacity building for key internal and external stakeholders
- During the last year, Multiplex has joined Stronger Together, providing training to both internal and external suppliers. In the Middle East, we have also implemented subcontractor management training on ethical labour practices, which has now been delivered to 208 management staff.

## Specific and Targeted Training

Training is a fundamental component of our strategy. It is critical to raising awareness of modern slavery and human rights risks within our business and our supply chain. We have developed and are delivering employee training specific to tackling modern slavery and human trafficking in our business and supply chains.

In 2017, we rolled out training for our employees on our policies and procedures and their roles. We also developed the "Tackling Modern Slavery" E-learning module and launched it via our new learning management system to raise awareness of modern slavery. In 2018, we continued to deliver this module for all employees, with 687 employees having completed the training so far in the UK.

During 2018, we delivered training and workshops with key supply chain partners, hosting a 'Anti-Slavery Day' and delivering tool box talks. Multiplex staff, including middle and senior management, received internal and external training as well as updates from government entities and NGOs.

### CASE STUDY | UNITED KINGDOM

## Anti-Slavery Day October 2018

In recognition of UK Anti-Slavery Day, Multiplex Europe rolled out internal training to all staff, including our supply chain, with more than 330 people taking part in the workshops to drive awareness on:

- Understanding how human trafficking and modern slavery can be found in construction
- How we can spot the signs
- Breaking down common myths or misconceptions about modern slavery

---

## Partnerships and Collaborations

---



### Building Responsibly

Multiplex is a founding member of Building Responsibly and in 2018 we co-developed the Building Responsibly Worker Welfare Principles, which now serve as the global standard for worker welfare, addressing key areas of worker vulnerability. The principles have been subsequently endorsed by seven construction companies as well as companies in the oil and gas sector. [www.building-responsibly.org](http://www.building-responsibly.org)



### Stronger Together

Multiplex is a programme sponsor of the Stronger Together construction working group, which provides a platform to share resources and supplies free training for our supply chain and employees on modern slavery. The Stronger Together website also offers a range of free downloadable materials and resources. This includes a short film, titled 'Concrete', which can be used to raise awareness in inductions and training. The organisation will also soon be launching an online progress reporting tool that Multiplex has been part of, enabling companies to monitor the progress of their anti-slavery initiatives and check them against industry standards. Stronger Together also runs regular interactive workshops across the UK that are open to all. [www.stronger2gether.org/construction](http://www.stronger2gether.org/construction)



### Achilles

In December 2018, Multiplex partnered with Achilles to conduct labour audits to assist us in prioritising and identifying issues relating to labour practices, including indicators of modern slavery. These audits have formed the baseline to support our intended actions in 2019. [www.achilles.com](http://www.achilles.com)



Gangmasters &  
Labour Abuse Authority

### Gangmasters and Labour Abuse Authority (GLAA) Construction Protocol

In July 2018, Multiplex signed the GLAA Construction Protocol to help tackle labour exploitation. This protocol aims to protect vulnerable workers through sharing information and intelligence, raising awareness in supply chains, and maintaining momentum within the construction industry. [www.gla.gov.uk/i-am-a/i-use-workers/construction-protocol](http://www.gla.gov.uk/i-am-a/i-use-workers/construction-protocol)



### Emirates Green Building Council

In November 2018, Multiplex presented on the topic of Worker Welfare and Responsible Construction to members of the Emirates Green Building Council to raise awareness and encourage industry-wide collective action, sharing best practice with other engineering and construction companies. [www.emiratesgbc.org](http://www.emiratesgbc.org)

## Thought Leadership, Advocacy and External Recognition

Throughout 2018, Multiplex has attended over 16 stakeholders' sessions, facilitating engagements further afield in London, Bahrain, and Washington D.C. In both June 2018 and November 2018, we delivered presentations on the Building Responsibly Worker Welfare Principles to a range of stakeholders in the oil and gas sector, the US Department of State, and the Global Fund to End Modern Slavery, sharing our insights on ethical recruitment in the Middle East. More broadly, we have delivered presentations to a range of audiences at different forums, seeking to build collaboration and further partnerships. These have included:

- The Bahrain Chamber of Commerce
- The Kuwait Chamber of Commerce
- NYU University Qatar

- The Emirates Green Building Council, where we have helped to build momentum, share lessons learned, and provided key insights.
- Business Ethics 2018 Conference
- The 4th Modern Slavery and Human Rights in Supply Chain Conference

Multiplex's approach to ethical labour practices in the Middle East has been externally recognised, winning the Taqdeer Awards for two years running, an award scheme led by Sheikh Mansour bin Mohammed bin Rashid al Maktoum. Most recently, in 2019, Multiplex's business in the Middle East was highly commended by the Institute of Risk and Safety Management at an award ceremony in London, in recognition of our work on ethical recruitment and driving industry change throughout the Gulf Cooperation Council countries.

## Next Steps

We are committed to the highest ethical standards and will continue to review the effectiveness of our policies, procedures and training to improve our ability to detect, mitigate and reduce the risk of modern slavery and human trafficking within our business and supply chain. For 2019, we have identified the following key actions:

1. Further develop and roll out in-house training on Modern Slavery, along with site-based training sessions;
2. Review and strengthen contractual terms to build capacity in our supply chain to tackle modern slavery within their own businesses and supply chains;
3. Continue to support and encourage industry efforts through our work with Building Responsibly; and
4. Continue conducting worker interviews and maintaining a monitoring regime

Multiplex publishes this statement on behalf of its operations in Europe, the Middle East and Canada, in accordance with section 54 of the UK Modern Slavery Act 2015 for the financial year ending 31st December 2018.



**Ashley Muldoon**  
CEO Europe, Middle East and Canada  
June 2019