

# Modern Slavery and Human Trafficking Transparency Statement 2021

## Introduction

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The UK Modern Slavery Act 2015 (the 'Act') requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains.

We are fully committed to playing our part in eradicating modern slavery and supporting ethical labour practices. We firmly support transparency and collaboration to eliminate the risks of modern slavery. Multiplex is committed to ensuring there is transparency in its own business and its approach to combating modern slavery throughout its supply chains. This is our sixth Modern Slavery Statement. We published our first Modern Slavery Statement in June 2016, and since then we have continued to take steps to tackle modern slavery in our business and supply chain.

This statement covers actions Multiplex Construction Europe Ltd has taken to ensure a zero-tolerance stance towards modern slavery and human trafficking in any part of our European business or any part of our supply chain. Raising awareness about the issue is a key element of the work to improve the standards, both in our own business operations and those of our supply chain. We expect all our subcontractors and suppliers to hold their own contractors accountable to the same high standards of ethics and integrity.

Our internal policies and training continue to be implemented and improved based on operational feedback and findings during the audits.

## About Multiplex

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Multiplex is a leading international contractor with a focus on sustainable growth and a presence in UK, Australia, Canada, and the Middle East. Established in Australia in 1962, Multiplex is known for shaping skylines and delivering iconic projects around the world. Our work to date comprises more than 1,000 projects with a combined value in excess of US\$90 billion. With more than 2,600 people globally, we have a large, mobile workforce that collaborates to share knowledge and apply world's best practice across our projects.

Over the last twenty years, we have delivered some of the most complex, challenging and iconic projects in the UK. Our focus is on prime London markets, with a significant presence in Glasgow and Edinburgh. We work with clients who share our values, analysing risk and thinking like a developer. This means thinking long-term and building high quality, mutually-beneficial relationships, only taking on projects that match our expertise and workbook.

As a premier construction company we have a simple purpose: to construct a better future. We move standards forward in every phase of programme delivery through our quality systems, digital and data capabilities, market-leading health and safety approaches and the positive impacts we create through our projects – on society, local communities and the environment.

Our supply chain is complex, extensive and global. It comprises consultants, subcontractors and suppliers delivering materials, equipment and services. We actively work with local governments, industry bodies, non-governmental organisations (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 2021

- Continual improvement of the governance and resourcing of our Ethical Labour Management System.
- Refresh and re-scope our supply chain auditing and due diligence assessments.
- Launched our Ethical Labour Dashboard to enable data collection and transparency; we have been using this data to improve our site-based controls.
- Revised our management processes to reflect recent changes due to BREXIT and workers' 'Right to Work'.
- Continued to leverage our influence by supporting industry efforts through our network, promoting greater awareness of the synergies between modern slavery, human rights, climate action and inclusive growth.
- Launched our Social Equity Strategy 'Leave no one behind', our 10-year social equity strategy to tackle inequality and injustice in the construction industry.

## Update on COVID-19

The ongoing difficulties presented by the COVID-19 pandemic in 2021 have continued to impact all sectors of the economy, however, Multiplex has continued to utilise the operating protocols developed in 2020 to great effect, prioritising the health, safety, wellbeing and rights of all workers in our operations. Looking beyond the COVID-19 pandemic, our ambition is clear, to become a business that everyone wants to work with and for; where everyone is safe, valued, consulted, engaged and respected.



## Our Policies, Formal Documents and Contracts

At Multiplex, we continue to maintain policies and procedures to set out minimum requirements and promote the highest standards of ethical behavior and social responsibility.

These policies and procedures are regularly reviewed and amended (where required) to ensure we continually 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.
- [Anti-Slavery and Human Trafficking Charter for Suppliers and Service Providers](#), which sets out the requirements for our suppliers and service providers.
- [Code of Business Conduct and Ethics](#)
- [Anti-Bribery and Corruption Policy](#)
- 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 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 of Construction Materials).

## CASE STUDY

### Leave no one behind launch

In December 2021, we launched '[Leave no one behind](#)', our 10-year social equity strategy to tackle inequality and injustice in the construction industry. Priorities are listed according to four strategic pillars encompassing: health, safety and wellbeing; diversity, inclusion, and respect; socio-economic value, and respecting communities. Under the socio-economic pillar, Multiplex identified targets to managing the risk relating to labour exploitation, human rights and modern slavery in order to promote fair and ethical labour practices.

## CASE STUDY

### United Kingdom – Hand SOS

On 18 October 2021, Anti-Slavery Day, we supported the launch led by Stronger Together of a SOS hand signal for modern slavery victims. This hand signal aims to help victims who are often unable to communicate easily because they may be under threat or intimidation or may not be able to speak English.



At the heart of our approach to ethical labour practices are several important internationally recognised declarations, standards and codes, including, but not limited to:

- The United Nations (UN) Guiding Principles on Business and Human Rights
- The Universal Declaration of Human Rights
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- Building Responsibly Principles
- BES 6002 Ethical Labour Sourcing Standard
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- The Dhaka Principles
- The Base Code of the Ethical Trading Initiative (ETI)

## Grievances and Whistle-blowing

Grievance mechanisms and access to remedy are essential components of Multiplex's due diligence and management system controls. While the nature of the grievance mechanisms available may differ from region to region, all of our employees and direct supply chain partners are provided with information on the Multiplex Reporting Hotline in accordance with our Ethics Hotline Policy. All workers are encouraged to submit feedback either directly, through their representatives, or anonymously on issues such as working and living conditions, pay, and recruitment processes, as part of our grievance and reporting mechanisms. This feedback is investigated and resolved as appropriate.

Multiplex continues to operate its regional and bespoke operational-level grievance mechanisms to provide actual or potential victims of adverse human rights impacts with an easy and accessible way to report risks and initiate remedy. Last year, 11 grievances were investigated and successfully closed out. Our grievance mechanisms are designed to be open and transparent and in line with the UN Guiding Principles. They currently include:

- Reporting hotlines
- Raising awareness via posters, toolbox talks, inductions and training
- Worker representative meetings
- Drop boxes
- Interviews and focus groups
- Audits

## Formal Documents and Contracts

Contractual controls are an essential component of our ethical labour approach, supported by robust due diligence. We continue to 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 our intranet. 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. In the UK, we have expanded our contract terms to include updated versions of our [Ethical Labour and Modern Slavery Policy Statement](#) and [Ethical Labour Principles](#).

Multiplex requires compliance (through contractual agreements) with our policies and procedures relating to modern slavery and worker welfare from all subcontractors, suppliers, agencies and labour providers. 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 a working environment conducive to tackling modern slavery and promoting ethical labour practices.

### CASE STUDY

#### Right to Work (RTW) checks post Brexit

Employment law in the United Kingdom changed post Brexit and all EU, EEA and Swiss citizens were required to register with the EU Settlement Scheme to legally work in the UK from 1<sup>st</sup> July 2021. Multiplex has actively been in contact with the authorities to determine our approach given the new Brexit requirements and the impact to our operations regarding Right to Work ('RTW') and status checks across our projects. A message from our Operations Director, Andrew Ridley-Barker, was sent to our supply chain to request updates in preparation for these new changes, such as a plan signed detailing how they would conduct the new legal RTW checks from the 30<sup>th</sup> June 2021 to ensure compliance, inclusive of agency workers and labour providers; whom would be responsible for conducting the EU settlement and visa checks; evidence of any trainings or toolbox talks to inform the workforce of the changes.

### CASE STUDY

#### Ethical Labour dashboards

In 2021, we launched our project-specific Ethical Labour dashboards. Hosted on PowerBI, the information in the dashboard is linked to our site access system, Datascope, and our grievances reporting system, infoExchange, and provides an insight to our Ethical Labour System grievances by principle, and percentage of:

- Agency workers in our supply chain
- Local labour
- Non-UK worker in our supply chain
- Self-employed workers in our supply chain

Our dashboards will continue to evolve to include worker interviews, subcontractor performance and subcontractor audits.

Additionally, we have started monitoring subcontractor churn across all of our projects, with targets to reduce churn rate by 10% in our first tier by 2025.

## Governance, Due Diligence and Risk Management

### Governance

We continued to operate our Global Human Rights Committee throughout 2021. Governed by terms of reference, the Committee reports to our Executive Board and is made up of representatives from human resources, health and safety, quality, sustainability, commercial, and legal, from across Multiplex's UK and Canada operations. The Committee met once during 2021, and has been overseeing Multiplex's human rights approach and operational risk management systems.

Specifically in the UK, Multiplex's Social Value and Community Team have been trained to continue to enforce, monitor and implement the Ethical Labour Management System to manage and address all labour related issues captured by our Policy and Principles. They have been trained to carry out worker interviews, site audits, and monitoring and report on the ethical labour dashboard and labour churn. The team plays a critical role in responding to and managing grievances raised by workers in our supply chain.

### CASE STUDY

#### Ecovadis Sustainability Rating Assessment

As part of our partnership with and as a trusted supplier to the University of Glasgow, Multiplex completed the Ecovadis Sustainability Rating Assessment. The Ecovadis rating captures environmental, social and ethical performance as well as sustainable procurement, and is a great benchmark of how we stand up to others in our industry and beyond. We were very proud to achieve a Platinum rating, putting us in the top 1% in the built environment. In 2021, we scored 80/100 in the labour & human rights section of our EcoVadis assessment. This ensured that we retained our EcoVadis platinum medal, placing us in the 99<sup>th</sup> percentile of the industry.



## Due Diligence and Risk Management

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### Supply Chain Procurement and Screening

Pre-procurement screening is critical to assessing supply chain risks. We expect our supply chain to embrace our values and support the Multiplex approach to sustainability and being an ethical contractor. In 2021, we updated our pre-qualification questionnaire, which includes questions on ethical labour practices, human rights and modern slavery, and requires confirmation that subcontractors subscribe to our ethical labour management system requirements. This means that 100% of all new subcontractor appointments have been screened for modern slavery risks. In 2021, all of our UK projects conducted identity checks to detect cases of identity fraud or potential victims of modern slavery. We identified 8 cases of fraudulent documentation, immediately relaying our findings to the police and following our modern slavery escalation chart which is based on the [UK Home Office Guidance](#).

### Supply Chain Monitoring and Audits

Our monitoring and auditing approach is risk-led, with a particular focus placed on contextual or legal drivers which are incorporated in our auditing framework and the specific questions we adopt.



## Ethical Labour Audits

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Following the launch of our Ethical Labour Management System in 2019, we now have consolidated our audit framework in place. COVID-19 impacted our audit plan, however we were still able to conduct project-specific audits across all our live projects in 2021. The scope of this audits includes, for example, grievances raised and closed out, and modern slavery requirements included in contracts.

### CASE STUDY

#### Worker Feedback Club

Continual improvement is key for the success of our Ethical Labour Management System. In 2021, we engaged with Worker Feedback Club to complete a pilot worker engagement programme in three of our sites. The aim of this pilot was to trial new methods to check for fair payment practices, right to work in the UK and the ethical treatment of operatives who work on our projects.

As part of our Worker Feedback Club pilot, 59 site operatives, mostly from drylining trades, were interviewed between October and November 2021, with both in-person interviews and responses recorded via an app. Three key themes were raised across the sites (pay concerns, wellbeing, and training blockers). All the feedback provided by the workers was analysed and taken into account when reviewing our management system.

## Investigating Modern Slavery Risks

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When we receive intelligence through ethical audits, our worker interviews, or from other sources such as media reports, we immediately investigate. Where our subcontractors identify possible indicators of modern slavery within their own operations, we support and monitor their investigations.

We have a risk-based escalation protocol, which means in all cases appropriate response action is taken by the relevant region and team. One risk we monitor particularly closely is wages being paid on time and in full; forming the basis of our 'early warning indicator' and response process. Where wage payment issues are identified, we work with our supply chain partners to remediate the situation in a timely manner.

Another significant risk to our business operations in the UK includes fraudulent documentation and right- to-work checks. We continue to use identity scanners across all of our UK sites. This year we have identified 8 cases of fraudulent documentation.

## Specific and Targeted Training

Training is a fundamental component of our strategy. It is critical to raising the profile of modern slavery, forced labour and human rights risks within our business and our supply chain. We continue to run targeted training for our employees in our business who have direct contact with workers in our supply chains, including:

- Training for employees on our policies and procedures and their roles via our annual Code of Business Conduct and Ethics Training which includes a section on Modern Slavery with a 92% completion rate.
- We also have our e-learning training module ‘Tackling Modern Slavery’ which raises awareness of the risks of modern slavery in construction and is founded on video content from the Chartered Institute of Building (CIOB). In 2021, we continued to deliver this module to our employees, with 74 people completing this training.
- Fair employment conditions are a vital for delivering ethical labour practices. In 2021, we continued delivering our interactive online induction, with nearly 23,000 workers being inducted. The induction content was founded on GLAA best practices, to empower workers on our sites with knowledge on their rights and remediation processes. This includes references to the UK labour laws, our grievance mechanisms and the Modern Slavery Hotline with a small questionnaire afterward.

### CASE STUDY

#### United Kingdom - Stronger Together training delivered for subcontractors

Multiplex is a founding member of Stronger Together and the Chartered Institute of Building’s joint construction programme, which aims to combat modern slavery, particularly hidden forced labour, human trafficking and other third-party exploitation of workers. Our subcontractors are required to attend Stronger Together construction specific training. This has led to 35 more of our suppliers and subcontractors receiving certified training on the risks and potential steps to be taken to safeguard the rights of construction workers in 2021, with a total of 84 subcontractors having completed the course.

## Reporting on Key Performance Indicators

In our 2020 Modern Slavery Statement, we reported on several focus areas. The list below details our performance in these areas and our points of action in 2021:

### 1. Supply chain procurement due diligence

- Multiplex continued to implement prequalification questionnaires across our supply chain to screen for ethical labour risks with 100% of our supply chain pre-screened in the UK. These questions include the following areas:
  - » Modern Slavery policy/statement
  - » Ethical labour practices
  - » Whistle-blower procedure and grievance mechanisms
  - » Training
  - » Due diligence or supplier assessment on subcontractors, agencies or suppliers
  - » Payment procedures and banding for roles and equal pay monitoring

### 2. Supply chain operational monitoring

- Every quarter, we review our subcontractors performance on site. That review includes ethical labour management considerations. The proposed score gets discussed with the subcontractors’ team to highlight areas of outperformance, as well as opportunities for improvement and failings to comply with our Ethical Labour Management system.
- Worker representative committee meetings continued across our projects led by our H&S teams, maintaining worker voice and enabling grievances to be raised.

### 3. The monthly review of analytics to capture high risk areas of the business

- We have further refined and resourced our UK Ethical Labour Management System which has enabled us to develop a live project level dashboard which captures several key indicators, as mentioned previously.

### 4. Grievance mechanisms and access to remedy

- We continue to maintain and strengthen our grievance mechanisms in line with the UN Guiding Principles, which have proven successful in the early detection of subcontractor malpractice, wage payment and forced labour risks in particular.

### 5. Capacity building for key internal and external stakeholders

- As detailed earlier in the statement, Multiplex is a member of the Stronger Together Construction Working Group, which delivers specific training to our subcontractors – the training is now embedded in our standard contract terms for all new projects to adhere to, leading 35 subcontractors being trained in 2021.

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## Influence, Advocacy and Thought Leadership

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### Achilles

In October 2021, we joined Achilles's Ethical Labour Practice Group, which brings us together with our industry peers to collaborate on supplier development and work at every level of our supply chain to tackle modern slavery.



### Building Responsibly

Multiplex maintains its position as Co-Chair of Building Responsibly. In 2020 we led a COVID-19 worker welfare virtual roundtable during the pandemic which led to the drafting of the guidance note '[Respecting Worker Welfare during COVID-19](#)'



Department for  
Business, Energy  
& Industrial Strategy

### Department for Business, Energy and Industrial Strategy (BEIS)

Throughout 2020, Multiplex has been actively involved in the [BEIS](#) Construction Industry Roundtables to discuss labour market challenges and opportunities, providing insights and commentary to the government to help shape the future of our sector.



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. In 2019, we continued to support the GLAA by encouraging 1000 of our supply chain to sign the protocol and this year we have built our online induction to capture some of the themes of GLAA construction protocol materials. This protocol aims to protect vulnerable workers through sharing information and intelligence, raising awareness in supply chains, and maintaining momentum within the construction industry. We have also widely adopted their tools in our induction materials.



### Stronger Together

Multiplex continues to be a programme sponsor of the Stronger Together Construction Working Group, which provides a platform to share resources and supplies free modern slavery training for our supply chain and employees.



### World Green Building Council (WGBC)

Multiplex is an active supporter of the [WGBC's Health and Wellbeing Framework](#) and its focus on social equity, inclusion and worker rights throughout the construction life cycle. Throughout 2021 we have provided technical support, thought leadership and commentary on the framework as well as sharing our approach to workers' rights, social justice and wellbeing on several panel discussions. Multiplex is also a Corporate Advisory Board member of the WGBC.

## 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 risks of modern slavery and human trafficking within our business and supply chain.

Our work on modern slavery cannot stand still. We will continue to assess, develop and improve our approach to modern slavery and broader forms of exploitation in the regions where we operate.

For 2022, we have identified the following key actions:

1. Review the governance and resourcing of our Ethical Labour Management Systems;
2. Implementing our Common Assessment Standard and additional ethical labour management questions to ensure adequate screening of our supply chain;
3. Engaging with a 3<sup>rd</sup> party to complete Ethical Labour Site Audits across all our sites; and
4. Re-launching our Global Human Rights Committee, including Australia, to share ethical labour best practice, lessons learnt and legislation updates; and
5. Continue to leverage our influence by supporting industry efforts through our network with the Institute for Human Rights and Business, Building Responsibly and the World Green Building Council to promote greater awareness of the synergies between modern slavery, human rights, climate action and inclusive growth.

Multiplex publishes this statement on behalf of its operations in the UK in accordance with section 54 of the UK Modern Slavery Act 2015, for the financial year ending December 31, 2021.



**Callum Tuckett**  
Managing Director  
Multiplex Construction Europe Ltd  
June 2022