

# MULTIPLEX

# Modern Slavery and Human Trafficking Transparency Statement 2024

## Introduction

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In accordance with Section 54 of the UK Modern Slavery Act 2015, businesses are required to publish an annual statement outlining the steps taken to prevent modern slavery and human trafficking within their operations and supply chains.

At Multiplex, we are fully committed to playing an active role in eradicating modern slavery. We believe in leading by example – through transparency, accountability, and by encouraging the wider industry to uphold the same standards. Since publishing our first Modern Slavery Statement in June 2016, we have continued to share our processes and progress openly.

We support only ethical labour practices and expect full transparency and collaboration from our supply chain partners. A shared commitment to eliminating modern slavery is a fundamental requirement for working with us. Raising awareness remains central to our strategy, and we expect all subcontractors and suppliers to ensure their own supply chains reflect the same high standards of ethics and integrity.

This statement outlines the actions we took during the 2024 financial year to uphold our zero-tolerance approach to modern slavery and human trafficking. In preparing this statement, we have taken into account the latest *Home Office Statutory Guidance for Transparency in Supply Chains* updated in March 2025.



## About Multiplex

We are a leading international contractor with a focus on sustainable growth and operations across the UK, Australia, and Canada. Established in Australia in 1962, we are known for shaping skylines and producing iconic projects around the world. We have delivered over 1,140 projects with a combined value exceeding US\$128 billion so far, supported by a global workforce of more than 2,800 dedicated professionals. We take immense pride in our people, whose collaboration and expertise drive the consistent application of global best practices across every project we undertake.

In the UK, Multiplex has been at the forefront of delivering some of the most complex and high-profile developments over the past 25 years. While our primary focus remains on prime London markets, we also maintain a presence in Glasgow.

Our purpose is simple yet powerful: **to construct a better future**. We are committed to raising industry standards at every stage of project delivery – through robust quality systems, advanced digital and data capabilities, market-leading health and safety practices, and the lasting positive impact we create for society, local communities, and the environment. We also strive to be the safest and most desirable workplace in the construction industry. As captured in the “Eight experiences” illustrated below, our mission is for everyone who works with or for us to feel:



We lead and manage a supply chain that is broad, multifaceted, and operates on a global scale. It includes consultants, subcontractors, and suppliers who provide the materials, equipment, and services essential to our operations. We actively collaborate with local authorities, industry associations, non-governmental organisations (NGOs), and our peers across the construction sector to promote a unified approach and implement effective strategies to tackle modern slavery throughout the industry.

## Key focus areas in 2024

- Strengthen governance and resource allocation for our Ethical Labour Management Systems through continuous improvement.
- Intensify audits of high-risk supply chain partners identified through our risk mapping process.
- Maintain regular engagement audits across all operational sites.
- Deepen collaboration with industry partners and stakeholders to raise awareness of modern slavery and human rights throughout the supply chain and beyond.
- Engage directly with subcontractors and on-site workers to promote awareness of modern slavery and ensure access to reporting mechanisms, regardless of location.
- Mandate full compliance with our Ethical Labour Principles across all first-tier supply chain partners – with no exceptions.
- Continue regular meetings of the internal Ethical Labour Committee to review trends, audit findings, and emerging issues.

## Our Policies, Formal Documents and Contracts

At Multiplex, we maintain clear policies and procedures to uphold our standards and promote the highest levels of ethical conduct and social responsibility across all areas of our business and partnerships. These policies are regularly reviewed and updated to ensure continuous improvement and alignment with evolving best practices. All policies are accessible to employees via our internal Intranet.

Our current policies and procedures include:

- **Health and Safety Standards**, which ensure high standards of workplace health and safety for everyone working on our sites.
- **Code of Business Conduct and Ethics**, which reinforces our commitment to the highest ethical standards, requiring all activities to be conducted with honesty, integrity, and full legal compliance.
- **Anti-Bribery and Corruption Policy**, which supports our zero-tolerance stance on bribery and corruption, complementing our Code of Conduct.
- **Whistleblowing Policy**, which provides a confidential mechanism for employees to report suspected wrongdoing or risks related to our operations, with all concerns addressed promptly and confidentially.
- **Anti-Slavery and Human Trafficking Charter for Suppliers and Service Providers**, which defines the expectations and requirements for our suppliers and service providers in supporting our anti-slavery efforts.

- **Anti-Slavery and Human Trafficking Policy**, which outlines our commitment to combating all forms of modern slavery and human trafficking within our operations and supply chain.
- **UK Ethical Labour Principles**, which address key areas of worker vulnerability and serve as our standard on ethical labour, worker rights and welfare.
- **UK Ethical Labour and Modern Slavery Policy**, as our business aim of delivering services of excellent quality and value to our clients goes hand in hand with our human rights and ethical labour practices priorities.
- Operation of a **toll-free reporting hotline**, which enables anonymous reporting of concerns related to unethical practices, including modern slavery.
- **Responsible Sourcing of Materials**, which requires key construction materials to be sourced from certified suppliers, including those accredited by the Programme for the Endorsement of Forest Certification (PEFC), Forest Stewardship Council (FSC), or BES 6001 (BRE Global's Framework Standard for Responsible Sourcing).

## CASE STUDY

### ppac 2.0 Right to Work Checks

Until 2024, Multiplex relied solely on subcontractors to carry out Right to Work checks. However, following the update to the Home Office Employer's Guide to Right to Work Checks, businesses are now strongly encouraged to ensure that contractors and labour providers conduct these checks on all individuals they employ, engage, or supply – or to carry them out directly.

The guidance highlights several reasons for this recommendation, including reputational risk, operational disruption, health and safety, and alignment with best practice.

In response, we have enhanced our site registration procedures to include on-site Right to Work checks, conducted on the day of an individual's induction. This step reinforces our commitment to compliance and ethical labour practices across all levels of our operations.

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's Worker Welfare Principles](#).
- The [Dhaka Principles for Migration with Dignity](#).
- The [Ethical Trading Initiative \(ETI\) Base Code](#).
- The [Institute for Human Rights and Business's Framework for Dignity in the Built Environment](#).

## Grievances and Whistleblowing

Grievance mechanisms and access to remedy are essential components of our due diligence and management framework, aligned with the UN Guiding Principles on Business and Human Rights. All employees and direct supply chain partners are informed about the Multiplex Reporting Hotline, in accordance with our Ethics Hotline Policy.

We actively encourage all workers – whether directly or through representatives, or anonymously – to provide feedback on issues such as working and living conditions, remuneration, and recruitment practices. These channels are part of our broader grievance and reporting systems, designed to support and protect our workforce. All feedback is thoroughly reviewed and addressed appropriately.

Our current mechanisms to report ethical labour concerns are designed to be open and transparent, and accessible. They include:

- Reporting hotlines
- Awareness-raising initiatives such as posters, toolbox talks, inductions and training
- On-site subcontractor meetings
- Drop boxes for anonymous submissions
- 3<sup>rd</sup> party site engagement audits
- Health & Safety Time-Outs

We continue to expand our operational-level grievance mechanisms to ensure that individuals who may be affected by adverse human rights impacts have a clear and accessible way to report concerns and seek remedy.

In the past year:

- **76 findings of concern** raised through third-party site engagement audits were investigated and successfully resolved.
- **Three payment-related concerns** were submitted via our website's "Contact Us" section. These were also investigated and closed out.

CASE STUDY  
Site Engagement Audits with Achilles

In 2024, we continued our partnership with Achilles to conduct biannual site engagement audits across all project locations, interviewing nearly 830 workers. Now in its third consecutive year, this initiative has significantly enhanced our understanding of the challenges faced by subcontractors and their workforce on-site.

Following each audit cycle, we collaborate closely with our supply chain partners to review findings and strengthen both their processes and those of their subcontractors. The consistent year-on-year reduction in audit findings is a strong indicator of the effectiveness of our implemented mechanisms and the depth of our shared commitment to ethical employment practices.

Year	Findings of Concern	Number of Workers Interviewed	Average Number of Workers on Site
2022	110	961	2,655
2023	91	956	2,999
2024	76	830	3,391

Our audits have driven positive change within our operations but also our supply chain. Following feedback from the Achilles audits, two of our subcontractors, Gardner & Co and Phoenix ME, revised their onboarding processes to better align with the expectations highlighted in the audit responses.



*Inspired by the findings, we reviewed our internal systems to identify opportunities for improvement. As a result, we have developed a comprehensive online onboarding process for labour providers. This portal outlines clear expectations, compliance requirements, and best practices to ensure a consistent and transparent approach across all sites - ultimately enhancing worker experience and operational efficiency.*

*As part of our commitment to ethical employment practices and combating Modern Slavery, we have developed a bespoke digital onboarding portal requiring all Suppliers, Sub-Contractors, and Consultants to (re)enrol by completing enhanced pre-qualification and compliance checks which include our ethical employment standards. This is followed by individual operative registration to ensure adherence to company policies and confirmation of fair employment conditions, including payment of at least the London Living Wage."*

**John Lambert**  
Head of Installations at Gardner & Co.



*The process enabled us to rethink our internal processes and policies which we have actioned since the ethical labour audits took place.*

*We annually update our policies and from the audit, it highlighted some best practice initiatives that we have included within our policy. This included incorporating modern slavery statements into all of our sub-contracts to ensure our supply chain are aware of our stance and processes regarding modern slavery.*

*We have also ensured that modern slavery training has been passed onto our supply chain management teams.*

*Moreover, one of the outcomes of the ethical labour audit was to enhance and review our PQQ processes for the procurement of our supply chain. We have invested into a new internal PQQ software that has streamlined and digitalised the auditing and onboarding of our supply chain."*

**Bayley Hall**  
Social Value Lead at Phoenix ME



## Formal Documents and Contracts

Contractual controls are a core element of our ethical labour strategy, reinforced by rigorous due diligence processes. We ensure that all employees are informed of their rights, responsibilities, and entitlements through formal employment contracts and supporting documentation, including working visas. Our policies and procedures are easily accessible via our internal platform, *The Multiplex Way*, on our intranet.

We continuously review and update our standard contract terms to ensure they remain relevant and that obligations related to modern slavery and worker welfare are clearly embedded throughout our supply chain.

All subcontractors, suppliers, agencies, and labour providers are contractually required to comply with our policies and procedures. We also support our supply chain partners in developing and implementing their own systems to identify and manage risks within their operations.

Our goal is to foster long-term, collaborative relationships with our value chain partners – creating a working environment that actively combats modern slavery and promotes ethical labour practices.

### CASE STUDY

#### Working Closely with our Supply Chain

In 2024, we placed 204 orders with our supply chain, amounting to a total value of £677 million. Our supply chain partners are responsible for delivering work on-site and are directly affected by the recruitment challenges facing the construction industry.

We recognise that tackling modern slavery requires a collaborative, solution-focused approach. When a grievance is raised, our priority is not to assign blame but to engage constructively with our partners to identify root causes and implement improvements. This approach strengthens our processes and helps prevent recurrence.

A notable example of this commitment was our proactive engagement with Madigan Gill to address and resolve a potential modern slavery case – demonstrating our dedication to ethical labour practices and meaningful partnership.

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*Multiplex supported us throughout the investigation, which enabled us to identify and implement improvements to our recruitment and onboarding processes, including a company-wide review of operative verification against hard copy IDs and personal information, and an enhanced on-site process which is reinforced by our Resource and Compliance team. This verification process now includes visual ID checks on the project and spot questions to confirm identity, strengthening our commitment to ethical labour practices across all operations.”*

**Tony Ball**

Managing Director for Madigan Gill Logistics & Principle Demolition Limited



## Governance, Due Diligence and Risk Management

### Governance

The highest governance body within our organisation is the European Senior Leadership Team (SLT). Together with the Global Senior Leadership Team, the SLT is responsible for the development, approval, and ongoing review of our strategies, policies, and objectives across economic, environmental, and social domains.

In relation to ethical labour and modern slavery, the SLT—who meet weekly—hold specific responsibilities, including:

- Staying informed on ethical labour issues relevant to our operations
- Monitoring progress against established goals and targets
- Integrating ethical labour considerations into business planning and decision-making
- Reviewing industry trends and assessing their potential impact

To support this governance structure, Multiplex has a dedicated Environmental, Social, and Governance (ESG) function, comprising our Sustainability and Social Value teams. Our Social Value team is trained to implement and monitor our Ethical Labour Management System, ensuring alignment with our Ethical Labour Policy and Principles. Their responsibilities include:

- Organising third-party site engagement audits on our sites
- Monitoring and reporting on our ethical labour dashboard
- Managing and responding to grievances raised by workers in our supply chain

This integrated approach ensures that ethical labour practices are embedded at every level of our operations – from strategic oversight to on-the-ground implementation.

### Due Diligence and Risk Management

#### Supply Chain Procurement and Screening

Pre-procurement screening is a critical step in identifying and mitigating supply chain risks. As part of our due diligence, all prospective subcontractors are required to complete a pre-qualification questionnaire that includes detailed questions on:

- Ethical labour practices
- Human rights compliance
- Modern slavery prevention

Subcontractors must also confirm their alignment with the requirements of our Ethical Labour Management System. As a result, 100% of new subcontractor appointments in 2024 were screened for modern slavery risks.

In addition, all UK projects implement identity and Right to Work verification checks as standard practice. These checks are designed to detect identity fraud and help identify potential victims of modern slavery at the point of site entry.

#### Ethical Labour 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.

As part of our Ethical Labour Management System, we have developed a consolidated audit framework that includes:

- Bi-annual site engagement audits: Conducted by a 3<sup>rd</sup> party, Achilles. The scope of these audits includes, for example, awareness of modern slavery and reporting mechanisms, payment and recruitment, and terms and conditions of employment.
- Supply Chain Mapping and Risk Assessment: We have completed a comprehensive mapping of our supply chain to identify areas of elevated risk. Based on this assessment, we have invited key supply chain partners to undergo third-party ethical labour audits. These audits evaluate whether partners have the necessary systems and procedures in place to uphold ethical employment practices.

This structured and proactive approach enables us to identify risks early, engage constructively with partners, and continuously improve labour standards across our operations.

## Investigating Modern Slavery Risks

When we receive feedback – whether through external site engagement audits, worker interviews, or other sources such as our anonymous hotline – we act swiftly to investigate any findings. If a subcontractor identifies potential indicators of modern slavery within their operations, we provide support and oversight throughout their investigation process.

We follow a risk-based escalation protocol to ensure timely and appropriate action is taken by the relevant teams. The process is as follows:

### 1. Initial Contact

The first point of contact on every site is the Social Value professional, who is responsible for receiving and documenting the concern.

## 2. Internal Escalation

The case is referred to the Head of Sustainability and the Project Director, who assess the issue and determine the appropriate next steps.

## 3. Senior Leadership Involvement

If necessary, the matter is escalated to the Senior Leadership Team (SLT) for further review and strategic decision-making.

All reported issues are thoroughly investigated, with actions tracked and reviewed until the grievance is resolved and formally closed out.

## Specific and Targeted Training

### Supply Chain Procurement and Screening

Training is a cornerstone of our strategy to combat modern slavery, forced labour, and human rights abuses. Raising awareness across our business and supply chain is critical – and we take this responsibility seriously.

We continue to deliver targeted training for employees who have direct contact with supply chain workers, including:

#### Annual Code of Business Conduct and Ethics Training

This mandatory training includes a dedicated section on modern slavery. In 2024, we achieved a 92% completion rate, reinforcing our commitment to ethical conduct and compliance.

#### 'Tackling Modern Slavery' E-Learning Module

This mandatory module is designed for all employees and raises awareness of modern slavery risks specific to the construction sector. It equips staff with the knowledge to identify and respond to potential issues.

#### Interactive Online Induction for Site Workers

All our workers onsite complete our online induction, which is based on Gangmasters and Labour Abuse Authority (GLAA) best practices. The induction covers:

- UK labour laws
- Workers' rights and entitlements
- Our grievance mechanisms
- The Modern Slavery Helpline
- A short post-induction questionnaire to reinforce understanding

This training empowers workers with the knowledge to recognise unethical practices and access support when needed, reinforcing our commitment to fair and ethical employment conditions. Additionally, every subcontractor delivers regular toolbox talk to their workforce on modern slavery and ethical labour.

## Reporting on Key Performance Indicators

In our 2023 Modern Slavery Statement, we reported on several focus areas. The table below details our performance in these areas and our points of action for 2024:

### 1. Supply Chain Procurement Due Diligence

We 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 the performance of our onsite subcontractors. That includes assessing their ethical labour management considerations. The proposed scope is then discussed with the subcontractor team to highlight areas of outperformance, as well as opportunities for improvement and any potential failings, to comply with our Ethical Labour Management system.

In 2024, worker representative committee meetings continued across our projects, led by our H&S teams, giving workers a platform and enabling any potential grievances to be raised.

### 3. Reporting Concerns Mechanisms and Access to Remedy

Throughout 2024, we continued to maintain and strengthen our mechanisms to report modern slavery concerns in line with the UN Guiding Principles. The implementation of our 3<sup>rd</sup> party site engagement audits has proved successful, allowing us the opportunity to speak to a larger number of workers and provide them with an additional channel to report concerns.

### 4. Capacity Building for Key Internal and External Stakeholders

As detailed within the next section, we continue to actively engage with internal and external stakeholders to raise the bar within the construction industry, including our clients and supply chain.

## Influence, Advocacy and Thought Leadership

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At Multiplex, we recognise that addressing modern slavery and promoting ethical labour practices requires industry-wide collaboration. We actively engage with partners, networks, and initiatives that drive positive change across the built environment.

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Gangmasters &  
Labour Abuse Authority

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

In July 2018, we signed the GLAA Construction Protocol to help tackle labour exploitation by sharing intelligence, raising awareness, and maintaining momentum across the construction sector. Although the protocol was [withdrawn in 2022](#), we continue to collaborate with the GLAA, benefiting from their strategic oversight and expertise in protecting vulnerable and exploited workers.

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### Nutral

We work closely with Nutral, both as one of our ethical employment auditors and as an active participant in their industry events. In 2024, we attended their second construction roundtable, where we joined supply chain representatives to explore how all stakeholders can contribute to fair and ethical employment practices across the sector.

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### Supply Chain Sustainability School

As a Partner of the Supply Chain Sustainability School, we contribute to building supply chain capability on topics such as ethical labour and modern slavery. We are active members of the Built Environment Against Slavery (BEAS) group – the UK's largest anti-slavery collaboration in the built environment. Our Head of Sustainability, Maria Fernandez Cachafeiro, currently serves as co-chair of this group.

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### World Green Building Council (WGBC)

We support the World Green Building Council's (WGBC) Health and Wellbeing Framework and its Better Places for People programme, which aim to prioritise human health and social value in the built environment.

In 2024, we joined a panel of speakers for the WGBC webinar, "The Four 'Scopes' of Social Impact: How can we action the 'S' in ESG across the built environment?". During this session, we explored the often-overlooked social impacts of buildings and infrastructure on communities, and how the construction sector can better integrate social value into ESG strategies.

We also continue to contribute to the WGBC's mission as a Corporate Advisory Board member, helping to shape global thought leadership on sustainability and social impact in the built environment.

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## Next Steps

At Multiplex, we remain committed to upholding the highest ethical standards. We continuously review the effectiveness of our policies, procedures, and training to strengthen our ability to detect, mitigate, and reduce the risks of modern slavery and human trafficking across our operations and supply chain.

We will continue to assess, develop, and enhance our approach to tackling all forms of exploitation in the regions where we operate.

### Key Action Areas for 2025

To further our commitment, we have identified the following priorities for the year ahead:

- 1. Becoming a Living Wage Employer**, including our supply chain, to ensure all workers earn a wage that meets basic living needs and supports a more equitable economy.
- 2. Increase on-site engagement with subcontractors and workers** to promote awareness of modern slavery and available reporting mechanisms, regardless of work location.
- 3. Complete The Good Work Standard accreditation**, demonstrating leadership in employee wellbeing, development, and ethical employment practices.
- 4. Enhance auditing of key supply chain partners**, particularly those identified as higher risk through our supply chain risk mapping.
- 5. Continue site-wide engagement audits** to maintain visibility and accountability across all projects.
- 6. Strengthen collaboration with industry partners and stakeholders** to raise awareness of modern slavery and human rights throughout the supply chain and beyond.
- 7. Explore opportunities to engage with individuals and organisations with lived experience of modern slavery** to deepen understanding and drive meaningful change across our workforce and supply chain.

This statement is published on behalf of Multiplex's UK operations in accordance with Section 54 of the UK Modern Slavery Act 2015, for the financial year ending 31 December 2024.



**Callum Tuckett**  
Managing Director  
Multiplex Construction Europe Ltd  
30 June 2025