

MULTIPLEX

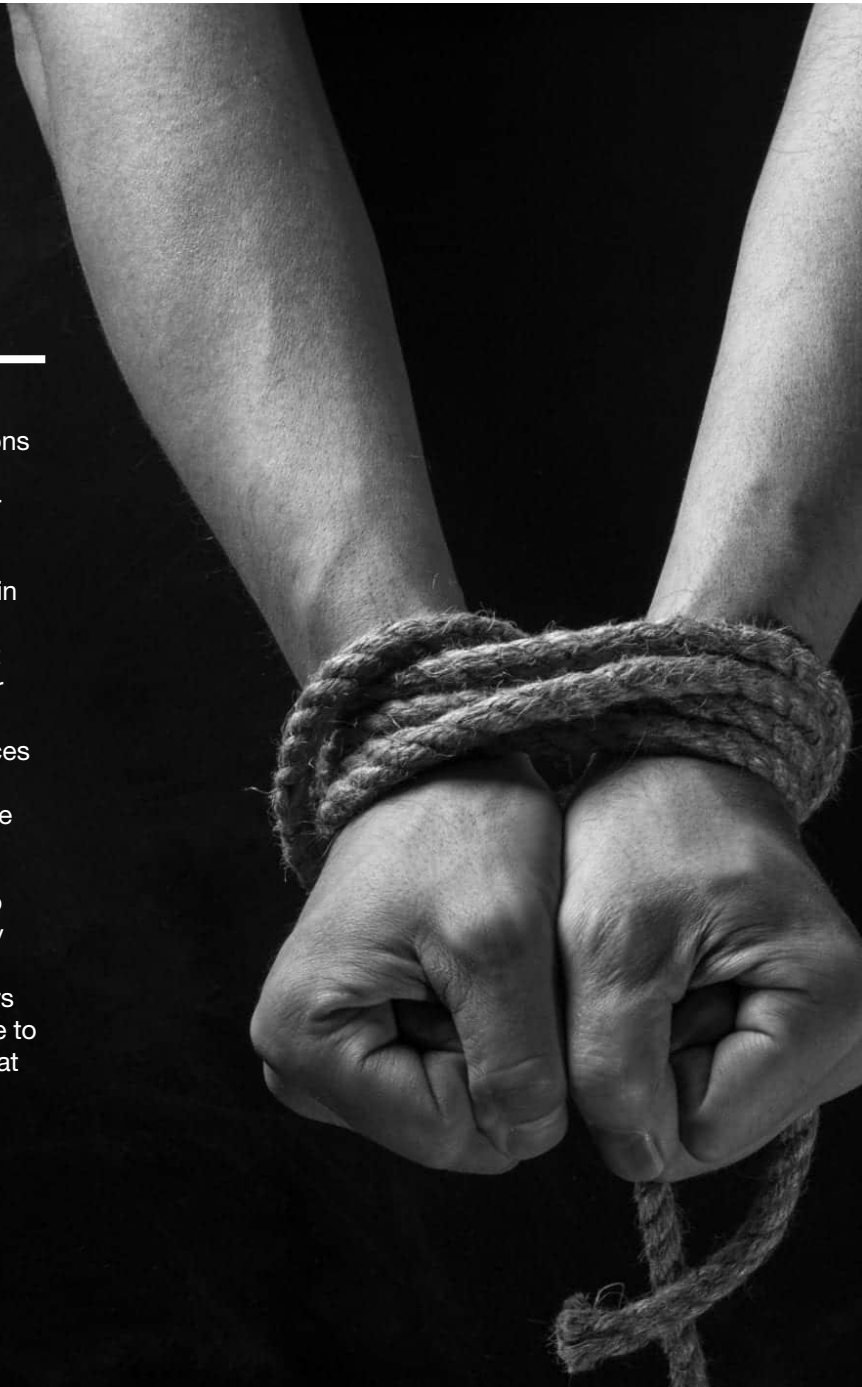
Modern Slavery and Human Trafficking Transparency Statement 2023

Introduction

Section 54 of the UK Modern Slavery Act 2015 requires businesses to prepare a statement that details the actions they have taken during the financial year to ensure that modern slavery is not taking place in their operations or supply chains.

At Multiplex, we are fully committed to playing our part in eradicating modern slavery, which means encouraging the wider industry to do the same, by being transparent and setting an example. In June 2016, we published our first Modern Slavery Statement, and have shared out processes since. We only support ethical labour practices and expect total transparency and collaboration from our supply chain too, because a shared goal to eliminate modern slavery is a prerequisite to working with us.

This statement covers the actions that we have taken to ensure a zero-tolerance stance towards modern slavery and human trafficking. Raising awareness is a key component of this, and we expect all our subcontractors and suppliers to hold their own contractors accountable to the same standards as we do, with ethics and integrity at the forefront.



About Multiplex

We are a leading international contractor with a focus on sustainable growth and a presence in 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 1,100 projects with a combined value in excess of US\$100 billion so far, with more than 2,500 people employed globally. We are hugely proud of our workforce that collaborates to share knowledge and apply world’s best practice across all our projects.

Over the last twenty-five years, we have delivered some of the most complex, challenging and iconic developments in the UK. Our focus is on prime London markets, with a presence in Glasgow too.

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. It is also our goal to create the safest and most desirable places to work in our industry. Our mission is for everyone who works with or for us to feel:



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 industry.

Key focus areas in 2023

- Continual improvement of the governance and resourcing of our Ethical Labour Management System.
- Engagement with a 3rd party to enhance our supply chain auditing by completing ethical management system evaluations on key trades.
- Continued engagement with a 3rd party to complete site engagement audits across all our sites, twice a year.
- Continued to leverage our influence by supporting industry efforts through our network, in partnership with organisations such as the Supply Chain Sustainability Council and Nutral, to promote greater awareness of the synergies between modern slavery, human rights, climate action and inclusive growth.
- All new supply chain partners were screened against our Ethical Labour Principles, to ensure compliance.
- Implemented our Common Assessment Standard and additional ethical labour management questions to ensure adequate screening of our supply chain.
- Retained our Platinum Ecovadis rating, with an above-average score on the Ethics section. Our Platinum score represents the top 1% across all sectors in 2023.

Our Policies, Formal Documents and Contracts

At Multiplex, we establish policies and procedures to maintain our requirements and promote the highest standards of ethical behaviour and social responsibility across everyone we work with.

These are regularly reviewed and amended, where required, to ensure continual improvement. Our current 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, noting our commitment to operating with the highest ethical standards. All our activities should be conducted with the utmost honesty and integrity, and in full compliance with all legal and regulatory requirements.

- Anti-Bribery and Corruption Policy, which, alongside the above Code of Conduct, illustrates how we should conduct ourselves and our zero-tolerance approach to bribery.
- Whistleblowing Policy, which provides a mechanism for employees to report suspected wrongdoing or dangers in relation to our activities. Any concerns raised are addressed in a timely and confidential manner.
- [UK Ethical Labour Policy](#)
- [UK Ethical Labour Principles](#)
- Operation of a toll-free reporting hotline.
- 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

University of Liverpool's Research: Modern Slavery and the Construction Sector

In 2023, eight members of our operational staff volunteered to support research being carried out by the University of Liverpool on modern slavery in the construction industry. The research used an innovative photo-elicitation methodology, in which Multiplex staff were asked in the weeks prior to an interview to take a photograph on their smartphone whenever they encountered something that prompted them to think about modern slavery. The photographs taken were then used as the basis for the interview, with our staff having the opportunity to explore their understanding of modern slavery and how it related to their work.

Eight major construction companies participated in the research, with approximately fifty interviews. The findings from the research have been used in a follow-up impact and engagement project, sharing relevant findings and facilitating improvements in practice within the sector.

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](#).
- [BES 6002 Ethical Labour Sourcing Standard](#) (discontinued in 2023).
- 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 system controls as a company. All 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, should they have any, either directly through their representatives, or anonymously, on issues such as working and living conditions, pay, and recruitment processes. This is part of the grievance and reporting mechanisms we have in place to support our employees. Any feedback is investigated and resolved as appropriate.

Our mechanisms to report ethical labour concerns 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.
- On-site subcontractor meetings.
- Drop boxes.
- Worker interviews conducted by our Social Value professionals.
- 3rd party site engagement audits.
- Health & Safety Time-Outs.

We continue to roll out our 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 remedies. Last year, 91 concerns raised via our 3rd party site engagement audits were investigated and successfully closed out. Additionally, three payment concerns were received via our Contact Us section in our website. These were also investigated and closed out.

The number of findings represents nearly a 20% reduction compared to 2022, thanks to the mechanisms put in place and our collaboration with the supply chain to improve ethical employment practices.

Formal Documents and Contracts

Contractual controls are an essential component of our ethical labour approach, supported by our robust due diligence processes. We educate our people on their employment rights, duties and benefits by ensuring that all our people have employment contracts and associated documents, such as working visas, with easy access to our policies and procedures, which are hosted on our intranet called “The Multiplex Way”. 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. We have expanded our contract terms to include updated versions of our Ethical Labour and Modern Slavery Policy Statement, our Ethical Labour Principles and our ESG Supply Chain Charter.

We require 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.

Governance, Due Diligence and Risk Management

Governance

The committee of highest governance within our company is the European Senior Leadership Team (SLT). Overall, the SLT and management are responsible for the development, approval and updating of our strategies, policies and goals related to economic, environmental and social topics. This is achieved in conjunction with the Global Senior Leadership Team. In relation to ethical labour and modern slavery related issues, particularly the SLT, who meet weekly and have the following responsibilities:

- Remain informed of ethical labour-related issues that are relevant to the business.
- Monitor and oversee progress against goals and targets for addressing ethical labour-related issues.
- Consider ethical labour-related issues in relevant business plans and decisions.
- Review industry trends and assess their impact.

At Multiplex, we have a dedicated ESG function, split into our Sustainability and Social Value teams. Our Social Value and Community Teams have been trained to continue to enforce, monitor and implement our Ethical Labour Management System, to manage and address all labour related issues within our Policy and Principles.

They have been trained to carry out worker interviews, site audits, and to monitor 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

Building Responsibly’s Member Profile

As a Founding Member of Building Responsibly, Multiplex was given the opportunity to feature in a blog series for member profiles. In this piece, we explained how we have been using Building Responsibly’s Worker Welfare Principles to drive the construction industry forward.

We launched their ethical labour management system in 2019, with a set of processes and procedures that become standard across our operations. The ethical labour management system includes their very own ethical labour principles which are based on Building Responsibly’s Worker Welfare Principles. The document is included within all of our subcontracts and disseminated to everybody to make sure it is very clear what we expect.

Due Diligence and Risk Management

Supply Chain Procurement and Screening

Pre-procurement screening is critical to assessing supply chain risks. As such, our pre-qualification questionnaire 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. All of our UK projects conduct identity checks as standard to detect cases of identity fraud or potential victims of modern slavery.

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 a consolidated audit framework:

- Monthly worker interviews, with a set questionnaire for the on-site workers interviews on Datascope. These interviews are completed by the Social Value Team.
- Bi-annual site engagement audits conducted by a 3rd 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.
- We completed a supply chain mapping risk assessment and have been asking some of our key supply chain partners to go through an ethical labour management system audit, also carried out by a 3rd party, to ensure that they have the processes and procedures in place to implement ethical employment practices.

CASE STUDY

Site engagement audits with Achilles

In 2023, we continued our engagement with Achilles to complete site engagement audits across all the sites, twice a year, with nearly 1,000 workers being interviewed. These interviews have been giving us greater visibility of the issues that workers may be facing. Following these audits, we worked collaboratively with our supply chain to review the processes and procedures, for themselves and their own subcontractors. This resulted on a reduction on findings in 2023 as compared to 2022.

Looking at average industry performance, we are pleased to see that, for those working on our site:

- They are more likely to have had the correct right-to-work checks completed
- They are more likely to earn above the living wage
- They are more likely to have a basic understanding of modern slavery

Investigating Modern Slavery Risks

When we receive feedback through the external site engagement audits, our worker interviews, or from other sources such as media reports, we immediately investigate the findings. 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 ensures that timely and appropriate action is taken by the relevant team in response to any issues raised. The first point of contact on every site is the Social Value professional, who is then responsible for referring the case on to the Head of Sustainability and Project Director. At this stage, next steps are arranged, which may include further escalation to the Senior Leadership Team if necessary.

All issues are thoroughly investigated, with actions taken and reviewed until the grievance is satisfactorily closed out.

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, and we take it seriously. We continue to run training for our employees 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.
- An E-learning training module, 'Tackling Modern Slavery', which is mandatory to all employees, and raises awareness of the risks of modern slavery in construction
- Fair employment conditions, which are key for delivering ethical labour practices. In 2023, we continued delivering our interactive online induction, which saw more than 18,000 workers inducted. The content was founded on GLAA (Gangmasters and Labour Abuse Authority) 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

Supply Chain Sustainability School's video

In June 2023, the Supply Chain Sustainability School launched a series of 35 new video resources for their members with the aim to inspire other organisations to explore what actions they can take across different sustainability issues, including ethical labour.

Our Head of Sustainability, Maria Fernandez Cachafeiro, participated in this series in the video Worker Voice & Ethical Labour Case Study: Multiplex Construction Europe. The short film explains how we have been working to embrace the worker voice across our supply chains – on all things from pay, employment conditions and wellbeing.

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

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 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 2023, 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 2023, we continued to maintain and strengthen our mechanisms to report modern slavery concerns in line with the UN Guiding Principles. The implementation of our 3rd 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



Building Responsibly

We are a proud Associate Member of Building Responsibly's Steering Committee. In 2023, we continued to collaborate with the wider group, sharing knowledge and feeding into their newsletters. We were also given the opportunity to feature in a blog series for member profiles. In this piece, we explained how we have been using Building Responsibly's Worker Welfare Principles to drive cross-industry progress.



Gangmasters and Labour Abuse Authority (GLAA) Construction Protocol

In July 2018, we signed the GLAA Construction Protocol to help tackle labour exploitation. This aimed to protect vulnerable workers through sharing information and intelligence, raising awareness throughout supply chains, and maintaining momentum within the construction industry. However, it was [withdrawn in 2022](#). The GLAA continues working in partnership with businesses to protect vulnerable and exploited workers, providing their strategic oversight and expertise.



Nutral

We have been working closely with Nutral, not only as an ethical employment practices auditor but also actively engaging in their industrywide events. In 2023, we hosted their first roundtable, discussing how all value chain members can support ethical employment across the workforce. With representatives across the supply chain, we discussed how we can all do our bit to ensure workers are treated fairly within the construction industry.



Supply Chain Sustainability School

We are a Partner of the Supply Chain Sustainability School, which represents a collaboration between clients, contractors and first tier suppliers who want to build the skills of their supply chains, including awareness of topics such as Ethical Labour and Modern Slavery. We are proud to be active participants in their Modern Slavery Working Group, the largest anti-slavery collaboration in the UK built environment, of which our Head of Sustainability, Maria Fernandez Cachafeiro, is currently co-chair.



World Green Building Council (WGBC)

We are an active supporter of the WGBC's Health and Wellbeing Framework, and its Better Places for People programme. In 2023, we provided technical support, thought leadership and commentary on the [Social Impact across the Built Environment: Prioritising People throughout the building life cycle paper](#), which provides a framework for how the construction sector can address social impact throughout the lifecycle of a building, in order to secure an equitable and resilient future for everyone. We are also a Corporate Advisory Board member of the WGBC.

Next Steps

At Multiplex, we are committed to the highest ethical standards and will continue to review the effectiveness of our policies, procedures and training, to continuously improve our ability to detect, mitigate and reduce the risks of modern slavery and human trafficking within our business and supply chain.

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

For 2024, we have identified the following key actions:

1. Continual improvement of the governance and resourcing of our Ethical Labour Management Systems.
2. Enhanced auditing of our key supply chain partners, identified as higher-risk in our supply chain risk mapping.
3. Continue with our engagement audits across all sites.
4. Continue to collaborate with other industry partners and stakeholders to increase awareness of modern slavery and human rights across all levels of our supply chain and beyond.
5. Engage with our subcontractors and workforce on site to increase the level of awareness of modern slavery and reporting mechanisms available to everyone, regardless of their work location.
6. Ensure that all of our first-tier supply chain sign up to our Ethical Labour Principles - with no exceptions.
7. Continue meetings of our internal Ethical Labour Committee to discuss key trends, site engagement audits, and any other issues that may arise.

We publish this statement on behalf of our operations in the UK, in accordance with section 54 of the UK Modern Slavery Act 2015, for the financial year ending 31 December 2023.



Callum Tuckett
Managing Director
Multiplex Construction Europe Ltd
30 June 2024