

# Modern Slavery and Human Trafficking Transparency Statement 2022

## Introduction

---

Section 54 of the UK Modern Slavery Act 2015 (the 'Act') requires businesses to prepare a statement that details 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. This extends to our supply chain. We only support ethical labour practices, and expect total transparency and collaboration from our supply chain, with a shared goal to eliminate modern slavery. Multiplex prioritises an open approach in our own business, and demands the same from our supply chains - we know that progress requires teamwork.

In June 2016, we published our first Modern Slavery Statement and since then we have continued to share the steps that we take to tackle modern slavery. Positive impact has to be a team effort.

This statement covers the actions that Multiplex Construction Europe Ltd has taken to ensure a zero-tolerance stance towards modern slavery and human trafficking. Raising awareness is a key element of our work towards eradicating modern slavery across the industry. 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

---

Multiplex is a leading international contractor with a focus on sustainable growth. We have a presence in the 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 1,100 projects with a combined value in excess of US\$100 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 all 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 presence in Glasgow. We work with clients who share our values, analysing risk and thinking like a developer. This means looking to the future and building high quality, mutually beneficial working 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 2022

- Continual improvement of the governance and resourcing of our Ethical Labour Management System
- Refreshed and re-scoped our supply chain auditing and due diligence assessments
- Engaged with a 3<sup>rd</sup> party to complete site engagement audits across all our sites twice a year
- Launched our Environmental Social Governance (ESG) Supply Chain Charter, to ensure that every part of our operations and extended supply chains help people thrive
- Continued to leverage our influence by supporting industry efforts through our network with the Building Responsibly, the Supply Chain Sustainability Council and the World Green Building Council 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 Multiplex Ethical Labour Principles
- Implemented our Common Assessment Standard and additional ethical labour management questions to ensure adequate screening of our supply chain
- All UK projects started reporting labour churn rate

## 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 behaviour and social responsibility.

These policies and procedures are regularly reviewed and amended (where required) to ensure continual improvement. 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](#), 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, guides 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.
- 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 ESG Supply Chain Charter

In 2022 Multiplex launched our ESG Supply Chain Charter – we care about people, and to us social equity means our end-to-end commitment to responsibility, justice and fairness within our operations. Our ESG Supply Chain Charter summarises our collaborative work, alongside our supply chain, to ensure that we are on track to deliver on our strategies, including our Social Equity Strategy – Leave No One Behind – by 2030. We need our supply chain partners on board to construct a better future. They are part of our process.

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. 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
- Worker representative meetings
- Drop boxes
- Worker interviews
- 3<sup>rd</sup> party site engagement audits

Multiplex continues to operate its 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, 110 observations were investigated and successfully closed out. The number of grievances has increased significantly compared to previous years due to the implementation of the regular site worker interviews and the 3<sup>rd</sup> party site engagement 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. 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.

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.

## **Governance, Due Diligence and Risk Management**

### **Governance**

The committee of highest governance within Multiplex Construction Europe Ltd is the European Senior Leadership Team (SLT). Overall, the SLT and management are responsible for the development, approval and updating of Multiplex Construction Europe's 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 in particular the SLT, who meet twice every week, 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

Multiplex has a dedicated ESG function, split into our Sustainability and Social Value teams. Our Social Value and Community Team 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

### Labour churn rate reporting

Following the launch of our Ethical Labour dashboards in the previous year, in 2022 we have seen the implementation of the Labour Churn on project specific reporting. Our dashboards continued to evolve, and we have started monitoring subcontractor churn across all our sites, with targets to reduce the rate by 10% in our first tier by 2025. It's hosted on PowerBI and the information in the project dashboard is linked to our site access system, Datascope.

## CASE STUDY

### Site engagement audits with Achilles

In 2022, we engaged with Achilles to complete site engagement audits across all the sites, twice a year, with nearly 1,000 being interviewed. The interviews gave 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 from the first round of audits as compared to the second one.

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

## Due Diligence and Risk Management

### 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 operating as an ethical contractor. In 2022, 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. All of our UK projects conduct identity checks 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.

Following the launch of our Ethical Labour Management System in 2019, we have now consolidated our audit framework. In 2022, we implemented monthly worker interviews and updated our questionnaire for the on-site workers interviews completed by the Social Value Team, on top of the bi-annual site engagement audits conducted by a 3<sup>rd</sup> party. The scope of these 3<sup>rd</sup> party audits includes, for example, awareness of modern slavery and reporting mechanisms, payment and recruitment, and terms and conditions of employment. Additionally, we have asked some of our key supply chain partners to go through an ethical labour management system audit, also carried out by a 3<sup>rd</sup> party, to ensure that they have the processes and procedures in place to treat our workforce fairly and make them feel valued.

## 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 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. Last year, we identified one case of fraudulent documentation, and immediately relayed our finding to the police, following our modern slavery escalation chart which is based on the UK Home Office Guidance.

## 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 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 89% completion rate.
- In 2022, we also launched our refresher e-learning training module ‘Tackling Modern Slavery’ which raises awareness of the risks of modern slavery in construction
- Fair employment conditions are key for delivering ethical labour practices. In 2022, we continued delivering our interactive online induction, with nearly 15,000 workers being inducted. The induction 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 Business Bytes

Multiplex was invited to discuss our company’s approach to ethical treatment of labour at the Supply Chain Sustainability School virtual business bytes. Luciana Campos, Senior Social Value Manager and María Fernández Cachafeiro, Head of Sustainability, had the opportunity to talk about the practical steps of combating modern slavery on site and the work we are doing to ensure ethical and lawful employment across our projects.

It was an interactive session where participants submitted questions to the panel of expert speakers. We explored the challenges around labour exploitation and modern slavery from a site perspective, as well as ethical employment trends in construction, insights, case studies, lessons learned and steps forward. The session included a testimonial of a survivor of Modern Slavery in the UK.

### CASE STUDY

#### Tackling Modern Slavery Panel at London Build 2022

In November 2022, we were invited to be part of the panel on ‘Tackling Modern Slavery’ at London Build – a large construction exhibition. We shared the stage with other Tier 1 contractors as well as Helen Carter, Lead Consultant at Action Sustainability. We spoke about our best practices as a result of our Ethical Treatment of Labour policy, and discussed industry approaches with the audience.

Some key points discussed during the session included the importance of raising awareness across all departments and levels of the workforce through training; having clear procedures in place and making employees aware of how and who to report any potential modern slavery cases to; and lastly cross-industry collaboration sharing best practice and lessons learnt to ensure everyone across construction is being treated fairly.

## Reporting on Key Performance Indicators

In our 2022 Modern Slavery Statement, we reported on several focus areas. The table below details our performance in these areas and our points of action in 2023:

### 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 on-site subcontractors. That includes assessing their ethical labour management considerations. The proposed score 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.
- 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. Reporting concerns mechanisms and access to remedy**

- We continue 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 to speak to a larger number of workers and given them an additional channel to report concerns.

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

- As detailed within the next section, Multiplex continues 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

---



### Achilles

Throughout 2022, we were actively involved in 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 is an Associate Member of Building Responsibly's Steering Committee. In 2022 we continued to collaborate with the wider group, sharing knowledge and feeding into their newsletters



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

In July 2018, Multiplex signed the GLAA Construction Protocol to help tackle labour exploitation. This protocol aimed to protect vulnerable workers through sharing information and intelligence, raising awareness throughout supply chains, and maintaining momentum within the construction industry. However, the Construction Protocol was withdrawn in 2022. The GLAA confirmed that resources have been reallocated into developing and supporting more focused partnership activity which is business-owned, with the GLAA providing their strategic oversight and expertise.



### Supply Chain Sustainability School

Multiplex is a Partner of the Supply Chain Sustainability School and active participant of their Modern Slavery Working Group, which Maria Fernandez Cachafeiro, our Head of Sustainability, currently co-Chairs. The School is 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 .



### 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. In 2022, we 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.

## CASE STUDY

### WGBC's Leadership Summit

The World Green Building Council celebrated its 20th anniversary by hosting the 'WorldGBC+20: Leadership Summit for Sustainable Built Environments' in London in June 2022.

Multiplex's Head of Sustainability, Maria Fernandez Cachafeiro, joined the Global Solutions Forum day, speaking on the panel about "Urban Resilience Strategies: Collaboration for Climate and Social Justice" alongside Farhana Yamin and Cassie Sutherland from C40 Cities, and moderated by the Cristina Gamboa, CEO of WGBC. Maria showcased some of the initiatives implemented following the launch of Multiplex's Social Equity Strategy, Leave no one behind, in December 2021.

## 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 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 2023, 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. Continuing with the site engagement audits across all sites; and
4. Continue to collaborate with other industry partners and our sphere of influence 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 location of work
6. Ensure that all of our first tier supply chain sign up to Multiplex's Ethical Labour Principles, no exceptions
7. Review and analyse our labour churn data to work towards a churn reduction in our first tier of Subcontractors

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 31 December 2022.



**Callum Tuckett**  
Managing Director  
Multiplex Construction Europe Ltd  
30 June 2023