The background features several large, overlapping, rounded shapes in various shades of green and one white shape, creating a modern, abstract design.

M^{ODERN} SLAVERY

Sixth Modern Slavery and Human Trafficking Statement

**Sir Robert
McALPINE**

This is our sixth Modern Slavery and Human Trafficking Statement, and it has been written and published in accordance with Section 54 of the Modern Slavery Act 2015.

Our statement sets out the actions Sir Robert McAlpine Limited (Sir Robert McAlpine) has taken in the previous financial year (1st Nov 2020– 31st Oct 2021) to address the inherent risk of modern slavery and unethical labour practices within our industry and supply chains.





OUR COMMITMENT

It is more than six years since the introduction of the Modern Slavery Act 2015. Our commitment to combatting the risk of modern slavery has only grown stronger.

As we continue to work to address this issue we are even more determined to take every action we can to ensure that everyone involved in our projects, whether they be our own people or contributing through our supply chains, are treated fairly and with respect, dignity and humanity. We believe decent work must receive decent pay. We commit to working collaboratively with all our people, including those who work with us as part of our supply chain to deliver what we hope will be a lasting change within our industry and society.

At Sir Robert McAlpine we understand the role we play in our industry and beyond with regard to combatting modern slavery and labour exploitation in its entirety.

As a tier 1 main contractor we recognise the importance of leading by example and working in collaboration with our supply chain partners to combat modern slavery and labour exploitation in its entirety.

ORGANISATION STRUCTURE AND SUPPLY CHAINS

We are a leading family-owned building and civil engineering company established since 1869. We design, develop, build and preserve some of Britain's most iconic buildings.

The projects we deliver cover a wide spectrum of sectors, including commercial, residential, retail, leisure, healthcare, education and infrastructure. While we deliver projects predominantly within the UK, the nature of our supply chain is global and therefore we must look beyond the UK when assessing the risk of modern slavery and unethical labour practices.



NUMBER OF SUBCONTRACTORS
WE DID BUSINESS WITH

1200+

NUMBER OF PROJECTS

54+

STRATEGIC SUPPLY CHAIN
PARTNERS (TIER 1)

250

TURNOVER

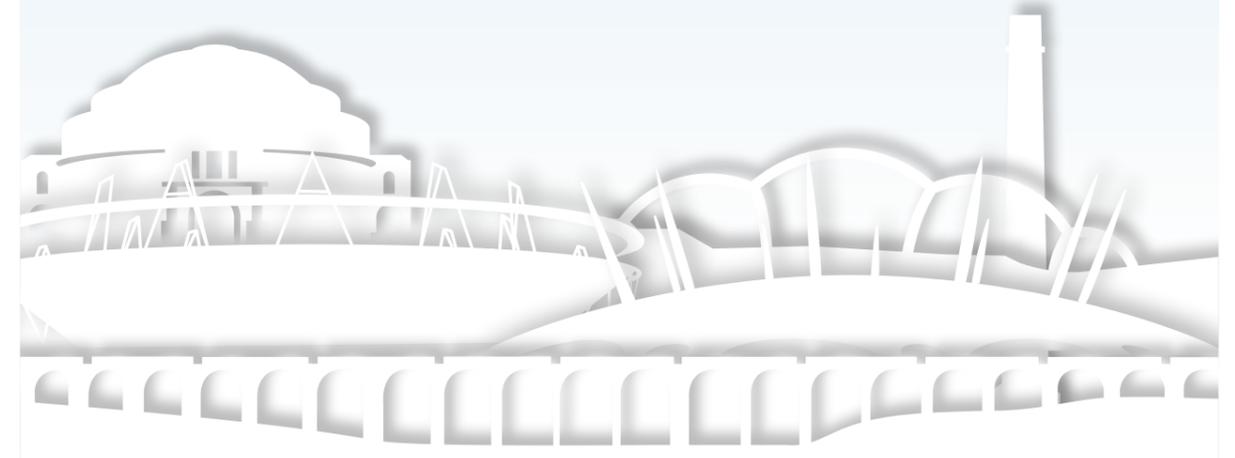
£1bn

YEARS IN BUSINESS

152+

NUMBER OF EMPLOYEES

2000+



The sectors we operate in

COMMERCIAL



RETAIL



RESIDENTIAL



HEALTHCARE



INFRASTRUCTURE



INDUSTRIAL



ENERGY



DEFENCE



EDUCATION



SPORT & LEISURE



SUMMARY OF KEY DELIVERABLES TO DATE

2016 - 2017

Assessing baseline procedures

Supported industry group in developing BES 6002 (Ethical Labour Sourcing Standard)

1st main contractor verified to BES 6002

Development and roll out of Modern Slavery e-learning module

Signatory to the GLAA Construction Protocol

First Site Labour Engagement Survey

2018 - 2019

Pilot exercise of 12 third party labour practice audits across key supply chain partners

Expansion of the third party audits across our strategic supply chain - completed 25

Rolled out our own Labour Code of Conduct which addressed issues we have seen from the audit programme

Active participant of the GLAA protocol. Assisted with development of the GLAA's site tools

Continued verification to BES 6002

Awareness campaign on Anti-Slavery Day

SUMMARY OF KEY DELIVERABLES TO DATE

2020 - 2021

Due to Covid, we continued a reduced audit programme which included looking at our tier 2 supply chain partners

Further implementation of the Labour Code of Conduct

Established a portal on our internal intranet where our people can access useful resources on modern slavery

Updated our mandatory e-learning module that all employees must complete

Rolled out role-specific training on modern slavery to works staff

Developed a site toolkit that contains multiple resources that our projects and offices can use to increase awareness of modern slavery

Worked with the Supply Chain Sustainability School to deliver a number of training (webinar) sessions on modern slavery and due diligence

Continued verification to BES 6002

RECENT DELIVERABLES

The diagram below highlights the key deliverables from this reporting year.



SUPPLY CHAIN PARTNERS

Our supply chain partners are broadly split into three categories:

- **Subcontractors (those providing labour and materials for a subcontract package on a project)**
- **Suppliers (those providing materials and no labour)**
- **Commodities (all overhead and indirect procurement)**

Our focus has remained on addressing the risk of modern slavery and labour exploitation in our subcontractors and their supply chains. We believe that this is where there are the greatest, unknown issues and where we have most leverage to enact change. We acknowledge that the risk is present in all companies we work with and therefore we must work to extend our actions to other parts of the supply chain.

Our supply chains are never static and can vary depending on the projects we deliver and the clients we work with. In the financial year 1st November 2020 to 31st October 2021, we worked with just over 1,200 subcontractors. However, what we determine our strategic supply chain to be is much reduced and during 2020-2021, our strategic subcontractors numbered around 250. This will be revised next year to concentrate on fewer but stronger relationships.

Similar to the number of subcontractors we work with, we also work with a large number of suppliers, which, in this reporting year, equated to just over 2,000 businesses.

POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN TRAFFICKING

Labour Code of Conduct: in 2019 we developed our Labour Code of Conduct, which was partly in response to the audit programme we had begun to roll out.

We have recently reviewed and updated the Code of Conduct to reflect any new findings from the audit programme and ensure it is current. There are now 36 clauses within the Code, and we use our third-party audit programme to check compliance to the Code.

Whistleblowing policy: our Whistleblowing Policy explains how anyone can raise a concern and through what means they can do so. We have an independent third-party whistleblowing helpline (0800 047 4037) which is also advertised on our projects so it is not simply SRM employees who can utilise it, but anyone working as part of our projects.

Recruitment and Selection Policy: as part of our Recruitment and Selection Policy, we state that no person should be charged a fee to obtain a job.





DUE DILIGENCE PROCESS

We understand how important it is to know our supply chain and who employs the people working on our projects. So we reach out beyond our tier 1 subcontractors to those further along the supply chain.

We believe that the risk of labour exploitation (including modern slavery) occurring increases significantly the further down the supply chain you go.

While Covid-19 initially impacted our audit programme, we restarted it in November 2020 and carried out 24 third party labour practice audits of our supply chain partners. These 24 audits included several tier 2 supply chain partners. While we do not contract directly with tier 2 supply chain partners, our tier 1 subcontractors do. Despite us not having contractual obligations with the tier 2 companies, we understand the need to engage with them to address the risk of modern slavery.

We recognise the need to work with tier 1 subcontractors to increase due diligence further down the supply chain. From the start of our audit programme, we have used the audits as an engagement and communication method, and not simply a means to check compliance.

Site engagement surveys did not recommence during 2021 due to Covid-19 but we are planning on re-starting them in Spring 2022. These audits are valuable as they provide us with feedback from people working on our sites.

KEY PERFORMANCE INDICATORS

Since we have been verified to BES 6002 (BRE's Ethical Labour Sourcing Standard) we have committed to achieving a set of objectives each year. We continue to do this and have a new set of objectives to work towards in 2022.

We recently undertook the verification process and, in recognition of our efforts and progress through 2021, have progressed from level 2 to level 3. This score underpins our commitment and drive as a business to continue to maintain and exceed our high aspirations. The progress between the last two verification assessments is illustrated using the spider diagrams opposite.

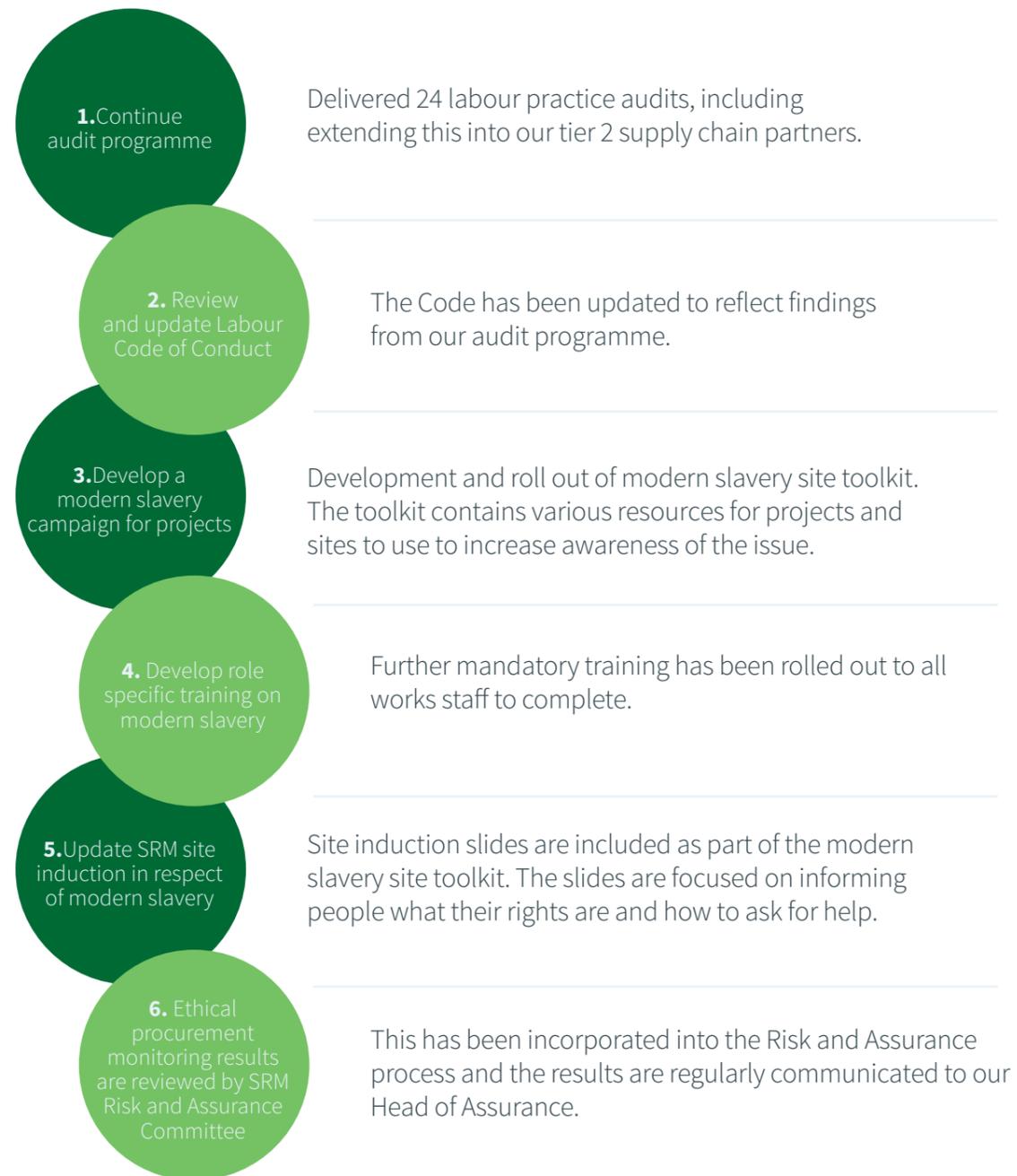
2021



2020



We achieved the majority of the objectives we set ourselves in 2020.



TRAINING

We continue to implement our mandatory e-learning module for all employees.

Having identified a need for role-specific training we developed and implemented a module for works staff that looks in further detail at the issue of labour exploitation (including modern slavery). We worked with the charity Unseen to develop this.

The site toolkit that has been developed for our projects includes a range of different resources and helps to increase awareness of the issue and inform people of their rights and how to ask for help.

We continue to engage with our supply chain on the topic, and in conjunction with the Supply Chain Sustainability School (SCSS) we invited a number of our supply chain partners to an online workshop in December 2020. This was a follow up to the previous training webinar we invited our supply chain to attend with the SCSS.



INDUSTRY COLLABORATION

We are committed to making further progress on tackling the risk of modern slavery in our supply chains and the wider industry. We can't do this alone and will continue to work collaboratively with our peers and supply chain partners.

We continue to take part in events that cover the issue, including a CIPS webinar in June 2021 and speaking at London Build in November 2021.

We are currently working with Achilles as part of its Labour Practice Group to develop and progress the audit programme.

Over the last few years we have learnt a huge amount about the wider issue of labour exploitation through engaging with our supply chain partners in this audit programme.

We believe that the learnings we have gained are something that can positively contribute to ensuring construction proactively works to address the risk of modern slavery.

This Statement is wholeheartedly supported and approved by the Executive Board on 23rd February 2022.



Paul Hamer
Chief Executive
Date: 23rd February 2022



Steve Hudson
Group Commercial Director
Date: 23rd February 2022



Proudly building Britain's future heritage

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