

Modern Slavery and Human Trafficking Transparency Statement for 2017

Global Contractor in Construction

Multiplex has been delivering landmark property and infrastructure assets for over 50 years. We are a leading global contractor with 7,000 employees across our operations. We have a collaborative workforce that shares knowledge and applies international best practice across all projects.

Our supply chain is complex, extensive and global. It is comprised of consultants, subcontractors and suppliers delivering materials, equipment and services.

We publish this statement on behalf of our operations in Europe, Middle East and Canada.

Key Focus Areas in 2016/17

- Developed a management framework, processes and internal controls to better monitor and remediate modern slavery risks;
- Embedded the management framework, processes and internal controls into our business operations and throughout our supply chain;
- Continued building both internal and external capacity of our stakeholders; and
- Enhanced our partnerships with leading industry wide collaborations on modern slavery, human rights and worker welfare.

Multiplex published its first Modern Slavery Statement in June 2016, and since then we have taken further steps to tackle modern slavery in our business and supply chain. Our core values are Care, Collaboration, Outperformance and Integrity and, as such, respecting Human Rights and tackling Modern Slavery is integral to our culture. We have been actively working with local governments, industry bodies, NGOs and our peers to contribute to the creation of a common approach and effective measures across the industry.

Our Policies, Formal Documents and Contracts

As reported in our previous statement, Multiplex has a number of policies in place that seek to promote the highest standards of ethical behaviour and social responsibility. In 2017 we have reviewed and amended our policies where required to ensure we continually improve.

Our relevant policies and minimum requirements 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;

- [Code of Business Conduct and Ethics](#);
- [Anti-Bribery and Corruption Policy](#);
- [Anti-Slavery and Human Trafficking Charter for Suppliers and Service Providers](#), which sets out requirements for our suppliers and service providers;
- Validation of all employees and construction workers' right to work;
- Health and Safety arrangements at the workplace for all construction workers on our sites; and
- Key construction materials to be responsibly sourced with suppliers holding certificates such as FSC/PEFC for timber or BES 6001 Responsible Sourcing of Construction Materials, in the UK.

CASE STUDY | MIDDLE EAST Welfare Management System

We recognise that regional businesses such as Multiplex Middle East (ME) are subject to specific local complexities and have therefore designed and developed a bespoke Welfare Management System (WMS). Our WMS consists of structured policies, principles, procedures, processes, key responsibilities and accountabilities based on the 'Plan-Do-Check-Act' cycle from the ISO management standards. In 2017 a peer review was performed on our WMS by a 3rd party human rights consultant to ensure alignment with international frameworks and facilitate continual improvement. Following the audit our recruitment agent due diligence toolkit was strengthened to capture specific nuances in the South Asian to Gulf Cooperation Council (GCC) migration corridor.

The Multiplex Welfare Model



Grievances and Whistle-blowing

All our employees are provided with information on the Multiplex Ethics Hotline in accordance with our [Ethics Hotline Policy](#). On Multiplex sites all workers are encouraged to submit feedback directly or indirectly, through their representatives, as well as anonymously on any aspect they wish through our grievance and whistleblowing mechanisms. This feedback is collected and addressed as appropriate.

Some examples of the steps we have taken to ensure access to remedy is readily available include:

- Grievance mechanism awareness raising via posters, tool box talks and inductions;
- Drop boxes; and
- Interviews & focus group meetings.

In accordance with the parameters of the 'UN Guiding Principles' guidance on grievance mechanisms, we have undertaken further reviews to ensure that grievance mechanisms available are applicable, open, and transparent.

Formal Documents and Contracts

We make our employees aware of all their rights, duties and benefits through their contract and associated documents and communications. During 2017, we have enhanced our standard contractual terms to further embed supply chain obligations in relation to modern slavery and worker welfare.

Multiplex has adopted the above policies and codes as provisions in its contractual agreements with its subcontractors, suppliers and recruitment agents, requiring compliance with our standards, approaches and practices. We will continue to work with our supply chain to implement equivalent policies, procedures and systems to manage identify and manage their own supply chain risks accordingly. We aim to foster long-term relationships with our value chain partners, which creates environments conducive to tackling modern slavery.

Governance, Due Diligence and Risk Management

Governance

Multiplex has convened a strategic working group including human resources, health and safety, quality, sustainability, commercial, and legal to tackle modern slavery and ensure our processes are robust.

Supply Chain Screening and Engagement

We expect our supply chain to embrace our values and support the Multiplex approach to sustainability and being an ethical contractor. In 2017, we have revised and improved our pre-qualification questionnaire to now include questions on modern slavery, human rights and worker welfare, as well as ensuring confirmation that they subscribe to our business ethics for health and safety, environmental and social sustainability requirements.

Supply chain engagement remains a key focus, where we have recognised the need to better assess supply chain risks, by adopting more diverse, dynamic and bespoke tools.

CASE STUDY | EUROPE

Supply Chain Risk Assessment



Multiplex carried out a preliminary risk assessment of its key global supply chain partners in the UK through the Supplier Ethical Data Exchange (Sedex) with a view of tailor making its due diligence regimes. Sedex is described as "the world's largest collaborative platform for responsible sourcing data" as it was established in 2004 and now has 50,000 members in more than 150 countries.

The Development of New Assessment Tools Comprising of Supply Chain Audits and Recruitment Agent Due Diligence Audits

The implementation of our policies is internally and externally audited. This includes health and safety and sustainability audits on our projects and manufacturers. Through our due diligence procedures we are checking that the workers on our sites and supply chain work in safe conditions, as well as requesting and monitoring the responsible sourcing of key materials through standards, such as FSC/PEFC timber and timber products in the UK.

CASE STUDY | MIDDLE EAST

Recruitment Agent Due Diligence

Multiplex has examined specific construction migration corridors in South Asia, identifying key migration related vulnerabilities, using appropriate due diligence tools to better mitigate and control risks.

Key Performance Indicators

Multiplex has taken steps to further enhance our process and performance indicator measurement techniques by developing analytical tools for the following key focus areas:

- Supply chain procurement due diligence;
- Supply chain operational monitoring;
- The adoption of analytics in attempt to capture high risk areas of the business in the ME;
- Grievance mechanisms and access to remedy; and
- Capacity building for both key internal and external stakeholders.

Specific and Targeted Training

Training is a fundamental component of our strategy and is critical to raising awareness of modern slavery and human rights risks within our business and our supply chain.

We have developed and are delivering training to key employees specific to tackling modern slavery and human trafficking in our business and supply chains. In 2017, we rolled out further training for our employees on our policies and procedures and their role.

During 2017, we delivered training and workshops with key supply chain partners. Our staff, including top and senior management, received internal and external training as well as updates from government entities and NGOs.

CASE STUDY | EUROPE Tackling Modern Slavery Training

In 2017, Multiplex developed the “Tackling Modern Slavery” e-learning module and launched it via its new learning management system. The module is compulsory for all employees to complete and it aims to raise awareness on the issue of modern slavery and to ensure all employees know what to do if they spot the signs.



E-learning module for all staff

Partnerships and Collaborations



Building Responsibly

In March 2017, Multiplex helped launch Building responsibly, a collaborative effort with five other engineering and construction companies, to set industry standard for worker welfare and share best practice. Through this platform, Multiplex has been instrumental in developing the group’s road map and founding Principles.

<https://www.building-responsibly.org/>



Stronger Together

The multi-stakeholder initiative first launched in 2013 for the consumer goods sector has a new CIOB-backed construction programme, co-sponsored by Multiplex. The Stronger Together website offers a range of free downloadable materials and resources. This includes a short awareness raising film, ‘Concrete’, that can be used in induction and training. The organisation will also soon be launching an online progress reporting tool that Multiplex has been part of, enabling companies to monitor the progress of their anti-slavery initiatives, checking them against industry standards. Additionally, Stronger Together runs regular interactive workshops across the UK that are open to all.

<https://www.stronger2gether.org/construction/>



APRES and the Eight Pathways to Best Practice

Multiplex is also a member of the The Action Programme for Responsible and Ethical Sourcing (APRES) – a learning network created by Loughborough University – that launched a white paper in September 2017 on the responsible ethical sourcing of materials products and people.

The APRES eight pathways model helps organisations examine their operations from a responsible and ethical sourcing perspective. Areas covered include policies and management systems, compliance, auditing and reporting, procurement, HR, financial management, recruitment and external relations. APRES is now managed by Constructing Excellence (CE), the platform which promotes best practice and industry change.

<http://apres.bre.co.uk/>

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**Gangmasters &
Labour Abuse Authority**

Gangmasters and Labour Abuse Authority (GLAA) Construction Protocol

This framework, launched in Autumn 2017, has been developed to encourage interaction between construction companies and the Gangmasters and Labour Abuse Authority. From 2018, the GLAA is running quarterly meetings to which Multiplex is taking part on sharing of best practice as well as intelligence, in confidence.

www.gla.gov.uk/i-am-a/i-use-workers/construction-protocol



Institute of Occupational Health and Safety (IOSH)

In January 2017 Multiplex presented on the topic of Worker Welfare and Responsible Construction in the Gulf Cooperation Council in order to raise awareness and encourage industry-wide collective action.

Next Steps

We are committed to the highest ethical standards and will continue to review the effectiveness of our policies, procedures and training in order to develop and improve our ability to detect, mitigate and reduce the risk of modern slavery and human trafficking within our business and supply chain. For 2018 we have identified the following key actions:

1. Establish a Human Rights Committee that will be governed by a Terms of Reference and reporting into the Board of Directors;
2. Continue to build capacity within our supply chain on tackling modern slavery within their business and supply chains;
3. Continue to support and encourage industry efforts to better facilitate collective action;
4. Enhance our due diligence mechanisms and risk assessment techniques; and
5. Reinforce our monitoring regime and feedback loops to our management systems.

Multiplex publishes this statement on behalf of its operations in Europe, Middle East and Canada in accordance with section 54 of the UK Modern Slavery Act 2015 for the financial year ending 31st December 2017.

Ashley Muldoon
CEO Europe, Middle East and Canada

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