

Slavery and human trafficking statement 2022

Introduction

As a leading global consultancy, we have a responsibility to use the influence we have, through delivering some of the world's largest infrastructure projects, to make a positive change for those who need it most.

This is captured in our Purpose:

To improve society by considering social outcomes in everything we do; relentlessly focusing on excellence and digital innovation, transforming our clients' businesses, our communities and employee opportunities.

We reject modern slavery in all its forms, including servitude, forced or compulsory labour, child labour and human trafficking. We recognise that there are risks of modern slavery in every country and industry and aim to work only with those suppliers who operate in a way that is consistent with Our Code – Delivering with PRIDE and can meet the standards that we set on rejecting modern slavery.

This statement confirms our compliance with Section 54 of the UK Modern Slavery Act 2015. In setting our policies and processes we aim to follow best practice as well as the UK Government guidance 'Transparency in supply chains'. In addition to publishing this statement on the Mott MacDonald Group website, we will also publish it on any associated websites to promote our commitment to this agenda.

This statement covers the whole of the Mott MacDonald Group and its worldwide operations, with the exception of our JN Bentley business based in the UK. It should be noted that our business in Australia (Mott MacDonald Australia Pty Limited) has also published a Modern Slavery statement in accordance with the Modern Slavery Act 2018.

We interface closely with the construction industry around the world and undertake some traditional construction activities in the UK through the JN Bentley business. These activities are covered in a separate and bespoke [modern slavery statement](#).

Mott MacDonald's structure, business and supply chain:

Mott MacDonald is an engineering, management and development consultancy involved in:

- Solving some of the world's most urgent social, environmental and economic challenges
- Helping governments and businesses plan, deliver and sustain their strategic goals
- Responding to humanitarian and natural emergencies
- Improving people's lives

Our expertise by sector includes advisory, built environment, energy, international development, transport and water. Our skills encompass planning, studies and design, project finance, technical advisory services, project and programme management, management consultancy and beyond.

Our Code – Delivering with PRIDE, consolidates our commitment to doing what's right and building an ethical culture throughout Mott MacDonald. It sets out our standards and expectations on the issues that matter to us; it is a guide for making good choices and living our PRIDE values: – Progress,

Respect, Integrity, Drive, and Excellence. These guide our behaviour, shape our culture and inform our relationships with our clients, stakeholders and each other.

By following Our Code, we build stronger, more trusting relationships with our clients, communities and colleagues and increase our ability to comply with country specific, federal and local laws, and regulations. We follow local legislation wherever we work and where Our Code provides the higher standard, we expect that to apply.

Being employee-owned frees us to choose the work we take on and focus on the issues that are important to our clients – and us. We're not in business to make the most profit for external shareholders: we want to do a great job for our clients, our communities and our people. We insist on the highest standards of integrity in all we do and are certified to the international standard ISO 37001.

Our 17,000 staff are mainly permanently employed, and the risks associated with slavery and human trafficking of our direct employees are generally low. Our professional staff have tertiary education, are often members of professional organisations and command significant levels of compensation in line with market norms. Our agency supplied labour is generally for skilled or professional roles, reducing the risk of modern slavery.

We operate globally with one corporate set of policies, directives and requirements through a common online business management system. Through this approach, all our colleagues in the Mott MacDonald Group, whether employed in the UK or around the world are required to comply with the UK Modern Slavery Act 2015 as well as any national legislative requirements, for example the Modern Slavery Act 2018 in Australia.

We recognise our responsibilities to ensure that our supply chain complies with International Labour Organisation conventions and have proper respect for the people supplying services to them. We are committed to achieving the ethical standards we set for ourselves with our supply chain and continue to work towards full transparency. Modern slavery aspects are included in our standard supplier and joint venture contracts in the UK.

We seek to work only with those who share our values and operate in a manner consistent with Our Code – in their dealings with us and within their own supply chains. We conduct due diligence checks on our clients, suppliers and partners. We communicate our expectations, monitor performance and address any issues. This includes withdrawing from contracts if our standards are not being met.

Our policies in relation to slavery and human trafficking

The key policies that impact our approach to slavery and human trafficking are as follows:

- Slavery and human trafficking policy,
- Equality, diversity and inclusion policy,
- Business integrity policy,
- People policy,
- Risk management policy,
- Supply chain policy,
- Safeguarding policy,
- Social responsibility and social value policy.

In the event that anyone connected to our business feels that one of our policies or Our Code has been contravened, the Speak Up helpline is a comprehensive, confidential internet and telephone-based reporting tool provided and managed by an independent third party ([Navex Global – EthicsPoint](#)). Our processes for handling reports are documented as part of our business management system. The service is promoted through campaigns within the business, including via posters in our offices. It is accessible to anyone, including all tiers of our supply chain and facilities management (FM) staff in all our offices. Reports are treated confidentially and can be raised anonymously where local legislation allows.

During 2022 we did not receive any reports (internal or via Speak Up) related to modern slavery or human trafficking. To ensure that low number of reports are not due to lack of understanding of Speak Up, we are continuing to promote our reporting mechanisms, both as part of Our Code and wider communications to the business. Over the next year we will especially promote this where we have a site presence and to our FM teams.

- **Our due diligence processes in relation to slavery and human trafficking in our business and supply chains to slavery and human trafficking in our business and supply chains**

In relation to slavery and human trafficking of direct employees in our business, we:

- Employ individuals through an interview process, whether they are employees or contract staff. This process seeks to confirm individuals share our corporate values, have a right to be employed for a specific job, are not breaching immigration regulations; have the necessary competence and aptitude for the position and are applying to work for us through their own free will.
- Seek to provide a living wage for all directly employed staff. In the UK we are a Living Wage Organisation.

We evaluate all potential and existing suppliers using a standard questionnaire to identify competence, compliance with our values and standards and to ensure they are addressing slavery and human trafficking risks. This assessment is repeated periodically. The process is supported through our procurement processes. We are currently reviewing our global approach to due diligence and procurement to identify best practice and strengthen this area in the future.

Due diligence on clients and suppliers is undertaken through combining our previous experience of working with the organisation, our local knowledge of them and the information surfaced through the Exiger Insight3PM service. This consists of an initial web-based search on a company and its affiliates, with a more comprehensive review available if needed.

We verify that we hold up-to-date and accurate information about our suppliers, supported by our supplier questionnaire prior to engagement. We check they comply with the requirements in our policies on modern slavery, ethics and anti-bribery, and they divulge essential financial and structural information to us. Following appointment, suppliers are assessed annually via a formal record of performance. The intention is to increase inclusion of modern slavery and human rights in these assessments over the next year.

Parts of our business and supply chains where there is a risk of slavery and human trafficking taking place and the steps we have taken to assess and manage the risk

Our modern slavery risks are broadly divided into the following categories of supply chains:

- FM staff (cleaning, janitorial, security, etc.) in our 140 offices across the world.
- Organisations providing resources or services to support the delivery of our business, such as suppliers of personal protective equipment, office supplies, catering organisations, accommodation and travel companies.
- IT and other office equipment, such as furniture

The above groups can be further subdivided into labour that is:

- Directly employed (where a company in the Mott MacDonald Group is the contracting party)
- Sub-contracted, where we employ a service agency who is the contracting party
- Associated labour, whereby our joint venture (JV) partners are the contracting party, or they sub-contract to agencies to provide labour

In all cases we seek to ensure that our purchasing practices do not create pressure on our suppliers that could lead to modern slavery for example, avoiding aggressive pricing that does not consider production costs, late payments or imposing unfair penalties.

In our UK and Europe region all approved suppliers are held on a central database. Those we have identified as higher risk such as our central UK FM contract, our personal protective equipment supplier and our furniture suppliers are subject to additional questions at tender stage and during regular contract reviews. We also carry out some spot checks for payments of a living wage and audits for working conditions at manufacturing facilities.

Our risks related to modern slavery vary between the countries and sectors we work in. Together with an external partner, we carried out two sets of geographically based country risk assessments focusing on modern slavery, building on the work begun in 2021. Countries to be assessed were prioritised by the current level of risk: using the Global Slavery Index and considering our activities in-country combined with the sector and region. This framework enables the business to assess the level of modern slavery risk, for a particular project in a specific country, based on likelihood and severity.

We have produced best practice guidance for our project managers to help them identify key areas of risk and to implement appropriate control measures to mitigate the risks. This has been integrated into our health and safety risk assessment process and training has been provided to our global safety managers and project safety advisors to support project staff. The areas of risk identified can be broadly grouped as:

- Outsourced low wage jobs, such as office cleaners, drivers and support staff
- Our commodity purchasing supply chain e.g. personal protective equipment, IT equipment, office furniture, tea and coffee, where unskilled labour is prevalent
- The construction related supply chains of our partners and clients around the world
- Staff untrained in recognising the signs of modern slavery
- Working with JVs and sub-consultants
- Failure to report and investigate suspected modern slavery issues

- **Effectiveness of our processes, including our key performance indicators**

As we deem the risk of slavery and human trafficking in our own business to be low, we monitor the performance of our suppliers in supporting us to meet our policy commitment and the services they provide to us. We also monitor our own compliance with our employment and procurement processes. In addition, we are audited around the world by third party organisations both for compliance with our internal business processes and with quality standards. We are confident this approach is appropriate to managing our risks for our tier one suppliers.

Our progress in 2022

We partnered with Slave-Free Alliance in Q4 of 2022. Slave-Free Alliance is an international social enterprise, wholly owned by global anti-slavery charity Hope for Justice. Slave-Free Alliance started in 2018 with a recognition of the need to support organisations in working towards slave-free operations and supply chains. Now, Slave-Free Alliance has a track record of supporting organisations of all sizes and from many sectors to build their resilience to modern slavery and labour exploitation. A gap analysis is planned for Q1 2023 which will identify recommendations for ongoing improvements to our approach.

We made updates to our policy to include child labour as a specific consideration. We improved our modern slavery statement to include specific updates to our targets set at the beginning of the year for the first time. We uploaded our 2022 statement to the UK Government registry.

We received our first positive intervention (where a member of staff visiting a client site took positive action against an instance of child labour in a client's contractor organisation) and used this as a case study presented to a range of internal audiences, to begin a conversation with the wider business on modern slavery and how they might encounter it and the importance of our actions. As a result, we have obtained the buy in of some senior sponsors around the business which we hope to expand on in 2023.

Externally, we continued to engage with our clients on modern slavery through conversations and their due diligence processes. We joined a government round table discussion on identifying instances of modern slavery in the construction sector.

Internally, increasing numbers of staff contacted our central team to engage on modern slavery issues. We also held our first Connected Thinking Forum, where different parts of the business with a focus on positive social outcomes including modern slavery were represented, at which we discussed how we might align to ensure that we get the best outcomes for people and planet.

We identified some staff who would be on the front line of modern slavery issues and updated the mandatory training to reflect this.

2022 Target	Progress against targets
Improving the guidance available for our project management and procurement staff on modern slavery risks and the control measures that need to be put in place to minimise the risk of modern slavery instances in our supply chains.	Developed a modern slavery learning moment, which was widely circulated to staff, management, territory managers and safety managers for onwards transmission. We also added a category to our health and safety positive intervention reporting system to allow staff to record any interventions

	they have made. We will continue to develop this guidance into 2023. Status: Complete
Improving the modern slavery training we have in place for our frontline staff, specifically working on training modules for our site-based staff and those who visit projects who are most likely to encounter modern slavery in the course of their work.	Added information on modern slavery, how to spot the signs of someone trapped in modern slavery and what to do to our mandatory training courses for staff who work outside the office and for those who work on construction sites. Status: Complete
Continue to identify and brief other key staff such as safety managers, office managers and procurement staff on our general role in combatting modern slavery.	Our key group of project safety advisors were briefed on modern slavery, what to look for and the resources available to them A face-to-face session was prepared for our UK office managers which unfortunately had to be postponed due to rail strikes, and will be picked up in 2023. Status: partially complete
Provide additional, more developed training to our safety staff and others to assist them in assessing modern slavery risk and discussing control measures with the staff in their business units.	We did not have the internal expertise to fully carry this out in 2022, however we expect to progress this in 2023 with the assistance of Slave Free Alliance. Status: ongoing
Helping to identify what good looks like for procurement specialists to more effectively assess suppliers.	Work was begun but not yet completed, however the results of the work done so far were sent to the internal ethics and compliance team for their review as part of the improvement of our due diligence processes. Status: partially complete
Implement the findings from the due diligence review carried out in 2021, which will include ESG due diligence.	Input information on modern slavery due diligence to the project which commenced in Q4 2022 and continues into 2023. Status: Partially complete
Developing and promoting more modern slavery learning resources as part of an ongoing internal interactive learning programme.	We produced a modern slavery learning moment, based around an incident seen by one of our staff at a client site. We promoted existing resources and key contacts to staff as part of the roll out of the learning moment. Status: Complete
Join an anti-slavery non-governmental organisation (NGO) to greater increase our capacity to make changes inside our organisation and in wider society.	During late 2022 we partnered with Slave Free Alliance, part of Hope for Justice. Status: Complete
Identify and prioritise gaps in our modern slavery risk management framework against industry good practice.	In late 2022, we requested Slave Free Alliance undertake a gap analysis of our systems. This is planned for early 2023, with the actions resulting forming part of our 2023 action plan. We look forward to the

	additional internal stakeholder engagement this will bring. Status: Not yet commenced
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2023 Targets

- Complete our planned gap analysis by Slave Free Alliance and commence work on the expected action plan generated.
- Develop a clear suite of posters to help staff based on site know what to look for and what action to take.
- Improvements to our due diligence process - increase inclusion of modern slavery as part of the due diligence improvement project happening company wide.
- Increase coverage of modern slavery issues in our supplier performance assessments.
- Further develop our bid response library and material for client conversations, so that our staff can use to help them develop their knowledge and engage in meaningful conversations with clients as to how we can move forward together.
- Identify senior champions around the business to promote and support the modern slavery agenda in all our regions.
- Continue our training needs analysis and arrange briefings and training for key staff which will include how to best respond to a reported incident to have a consistent robust approach.

Training and awareness on slavery and human trafficking available to our staff

We train all our staff on ethics and compliance with our values and processes. Our training on people management and communication skills are directly aligned with our PRIDE values. This creates a strong culture of tolerance of others, transparency in decision-making and mutual respect, that supports our training module on modern slavery which is available to all staff.

[Our Code - Delivering with PRIDE](#) contains our standards and expectations for all our staff on modern slavery and human rights. All staff complete training on Our Code and certify that they will comply with its provisions. We make Our Code available to our suppliers and on our external website to highlight our desire to work only with those who can meet our standards and expectations, including on modern slavery and human rights. Our Code helps all those who work for us, or with us, to improve their understanding of modern slavery and details how to raise concerns related to this.

We make use of dilemmas to help staff more fully understand some of the issues they might encounter. These are scenarios ending with a question to promote group discussion of topics and to help staff think through what they might do in a specific situation.

In 2022, we made updates to our mandatory safety training to include modern slavery for key groups of staff who work outside the office. In 2023 we will undertake a further training needs analysis to identify additional roles which would benefit from enhanced training. We would expect this to be staff in roles such as supplier management, human resources, office management, or staff who are based on our client's construction sites.

In 2023 we will run an internal engagement campaign around Modern Slavery to coincide with the publication of this Statement, focusing on key stakeholders in the implementation of our modern slavery policy.

The above statement was approved by the Executive Board of Mott MacDonald in May 2023 and signed on their behalf by Cathy Travers, Group Managing Director.

Cathy Travers

June 2023