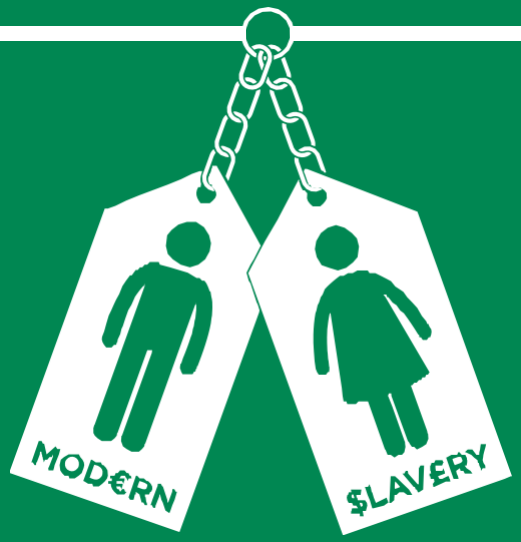
CONWAY
great people : great work

MODERN SLAVERY STATEMENT 2022-2023



PEOPLE FIRST
GO HOME SAFE

INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes FM Conway's slavery and human trafficking statement for the financial year ended 31 March 2023. It covers the activities of FM Conway. We are committed to achieving the highest level of ethical standards and implementing sound governance arrangements to ensure integrity and objectivity in our business activity. We embrace the principles of fairness, inclusion, and respect in everything we do.



SPEAKOUT

SpeakOut App
www.fmconway.co.uk/speakout
or call anonymously on **0808 169 1521**

CONWAY
great people : great work

CARE · INNOVATION · INTEGRITY · EXCELLENCE

OUR BUSINESS

FM Conway is a leading infrastructure services company delivering vital services in transportation, the built environment and open spaces for communities and business. We undertake our services through our self-delivery model and combining our in-house Consultancy team with frontline operational excellence, we inspect, design, build, enhance, and maintain essential infrastructure services for the community.

The group's turnover *(including its subsidiaries)* for the year ending 31 March 2023 was £535 million.

OUR SUPPLY CHAIN

FM Conway uses a wide range of suppliers who supply goods for sale and/or who provide services to our business and our customers. We have more than 1500 suppliers and subcontractors supporting our business that are predominantly (99%) based in the UK. We continue to target our direct spend in low-risk environments and in 2022/23 less than 0.005% of this spend was with suppliers in high-risk countries of origin (countries being determined as high risk by the Global Slavery Index).

All new agreements with companies providing subcontracted labour to FM Conway include an anti-slavery provision, including the right to audit a vendor's books and processes to ensure the vendor is compliant with all relevant laws and regulations. Our purchase order terms and conditions include an anti-slavery clause, and it is company policy to have a purchase order in place prior to commencing any work.

We have regular review meetings with suppliers identified, through our risk assessments, as higher risk.



OUR POLICIES

We are committed to ensuring that there is no modern slavery, child labour or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our position of zero tolerance of modern slavery and human trafficking in any form and reinforces our commitment to acting ethically and with integrity in all our business relationships.

Our Child Labour Policy requires our own business and all our suppliers to adhere to the standards set out by the International Labour Organisation's Conventions 138 and 182 as regards the employment of children and young people. We may terminate our relationship with suppliers and other business partners if they breach this policy.

We have a Supplier and Contractor Code of Conduct which sets out our specific expectations for all current and prospective suppliers and subcontractors, to reinforce the company's commitment to be free from force, bonded or compulsory adult or child labour throughout our supply chain. We have embedded our comprehensive modern slavery training for anyone involved in procurement or in the management of contracts that use subcontracted labour.

Our own workforce signs a Code of Conduct which requires them to act with integrity in all their dealings with either their colleagues or suppliers. A full explanation of this Code of Conduct is carried out with all new employees.

Our Ethical and Sustainable Procurement Code sets out our standards with respect to buying goods and services; as well as detailing requirements with respect to human rights, child and forced labour and modern slavery. This forms part of our contractual relationship with our suppliers.

We are committed to achieving the highest level of ethical standards and strive to ensure integrity and objectivity in our business activity. It is the company's responsibility to provide employees and members of our supply chain with a safe and confidential mechanism to raise concerns and report breaches of our standards, processes, or protocols. Our Whistleblowing Policy provides a mechanism for our employees to report any concerns or suspected breaches of our policies.

Our Speak Out helpline and app enables employees and others to raise any concern or to seek advice on a matter related to compliance with the law, our published business ethics, and our company Code of Conduct directly with the business. Our helpline is for all employees and for third parties with whom the company has a business relationship (including employees, contractors, customers, suppliers, and agents) if they observe wrongdoing or wish to raise concerns.

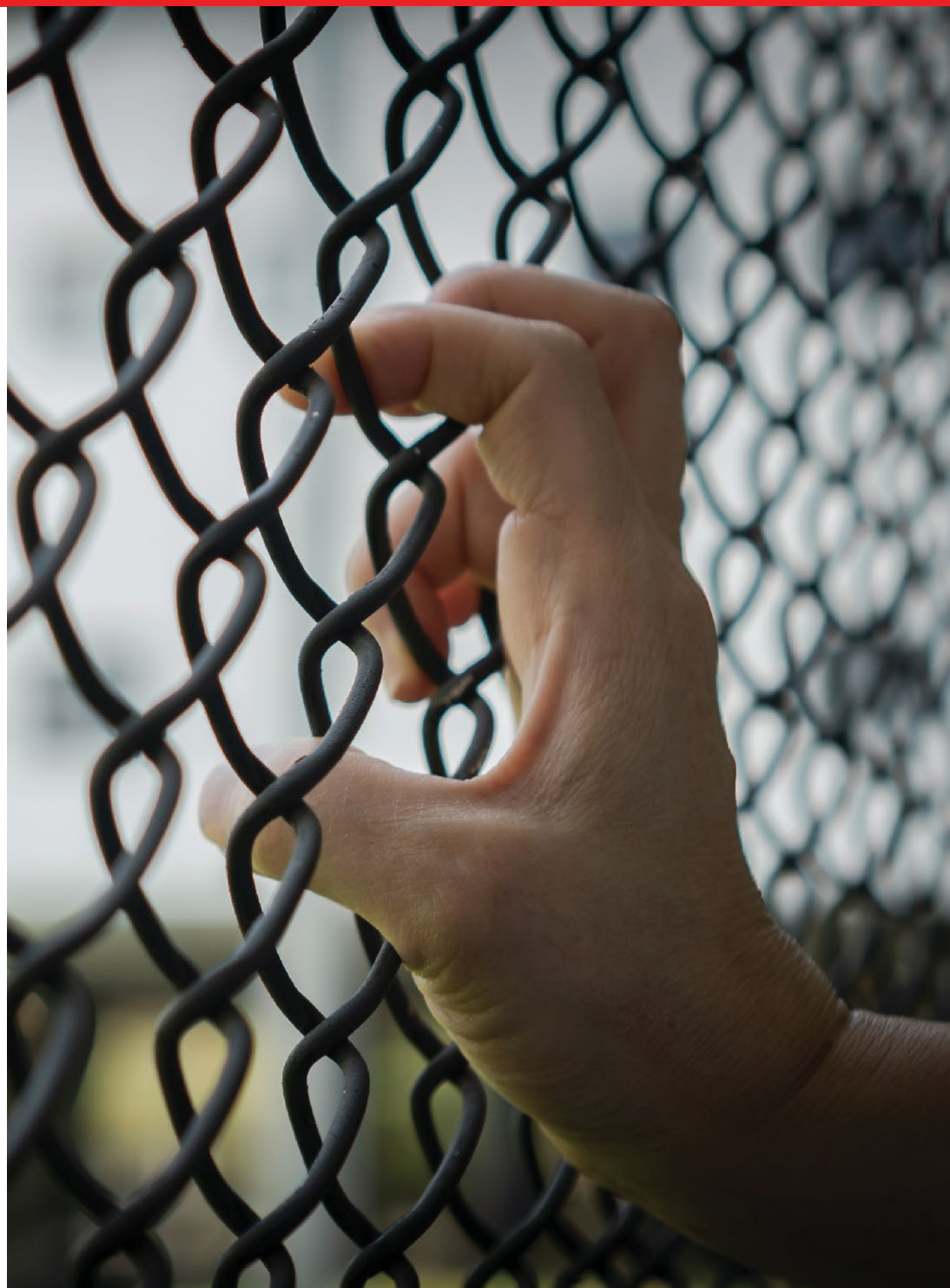
DUE DILIGENCE AND RISK ASSESSMENT PROCESSES

We carry out detailed due diligence checks on our supply chain, to include reviewing for risks of modern slavery and human trafficking. We have systems to identify and assess any area of potential risk of transgression of our business ethics in our own company and our supply chains, and to protect whistle blowers.

Our Internal Audit department annually reviews our approach to compliance with the Modern Slavery Act 2015 and to date, this testing has not highlighted any red flags that indicate modern slavery is present in our workforce or supply chain. Our annual audit has concluded that the controls evaluated that demonstrate compliance with the Modern Slavery Act were deemed adequate and appropriate to provide assurance that risks are being managed. Our Internal Audit team carries out a quarterly evaluation of subcontractor invoices and this includes a review of Modern Slavery risks during their review and testing.

Should any future audit elicit evidence of non-compliance with the standards we have established, we support our suppliers to achieve improvement and adherence to our Key Performance Indicators (KPIs); in some cases, we accept that this may not be possible, and our business relationship may need to be brought to an end and the organisation be removed from our approved supplier list.

To safeguard the welfare of our directly employed and subcontractor workforce, we take steps to ensure that any potentially suspicious or concerning matters that come to light – for example, workers requesting payment of their wages into a bank account that is not their own, or multiple workers living at the same address – are fully investigated.



TRAINING AND STAFF AWARENESS

All employees undertake Modern Slavery Training when they join the business; thereafter, annual Modern Slavery Training is mandatory for all employees. An e-learning module is available to all, and Toolbox Talks are delivered to frontline staff to ensure that training reaches anyone without the equipment or ability to participate electronically.

All training materials are regularly reviewed and will be updated when changes in legislation are made, with employees then asked to complete the latest version of training.

Our fixed sites and mobile welfare units display visual materials highlighting the 'Signs to Spot' for modern slavery to raise awareness and promote how workers can report any concerns via our company Speak Out helpline. These materials are translated into Romanian, Polish, Albanian, and Lithuanian to ensure key material relating to modern slavery is accessible to non-English speaking workers.

We have three alternative methods by which employees are able to raise any potential queries or suspicions if they feel Speak Out is not the best medium. Our SHEQ department will investigate concerns that are flagged to them via either the Near Miss reporting or Non-Conformance Reporting procedures. Our Human Resources team will also deal with any matters raised directly with themselves and/or support investigation where required.

BIG IDEA

PEOPLE FIRST GO HOME SAFE

NON CONFORMITY REPORTING

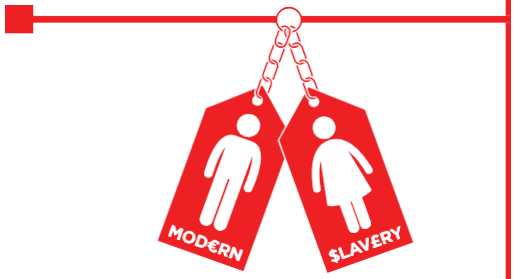




PUBLIC AWARENESS

All of our mechanisms for raising concerns, making suggestions or reporting issues - Speak Out, Near Miss, and the Big Idea – are outward-facing and are open to any member of the public should they wish to make us aware of anything that requires our consideration or investigation. This includes any concerns regarding Modern Slavery.

https://www.fmconway.co.uk/contact-us





Contact us

Visiting us? Use our interactive map above to plan your journey.

Have we left something behind? Let us know!

Click here to report left items

If you think something isn't right, please tell us about it.

Click here to submit your complaint

Tell us about anything you think we could change or do differently and we'll give your idea some thought.

Click here to submit your Big Idea

Near Miss reporting lets us identify and prevent potential accidents. Keep talking – if you see something that isn't safe, tell us about it.

Click here to submit your Near Miss

SPEAK OUT

We are committed to achieving the highest level of ethical standards and strive to ensure integrity and objectivity in our business activity.

Reporting a concern through Speak Out gives you the opportunity to make the report in confidence and without fear of retaliation. It also provides the Company an opportunity to investigate and take appropriate action to ensure the Company's long-term success.

Click here to Speak Out

MONITORING OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We are a signatory to the Gangmasters & Labour Abuse Authority Construction Protocol.

As part of our ongoing commitment to combating modern slavery, child labour and human trafficking, our Internal Audit department complete an annual audit of modern slavery and consider modern slavery including a review of our procurement processes across the organisation; this audit serves to highlight any potential risks and mitigating actions concerning modern slavery.

Our (KPIs) enable our Internal Audit team to evaluate the effectiveness of these actions.

Our Security team conduct awareness sessions of our Speak Out facility, focusing on modern slavery and this year it has included a promotional week, where road shows have been carried out across the business and information has been provided face to face. Details of Speak Out and the type of issues that it might be used for, have been highlighted to include modern slavery.

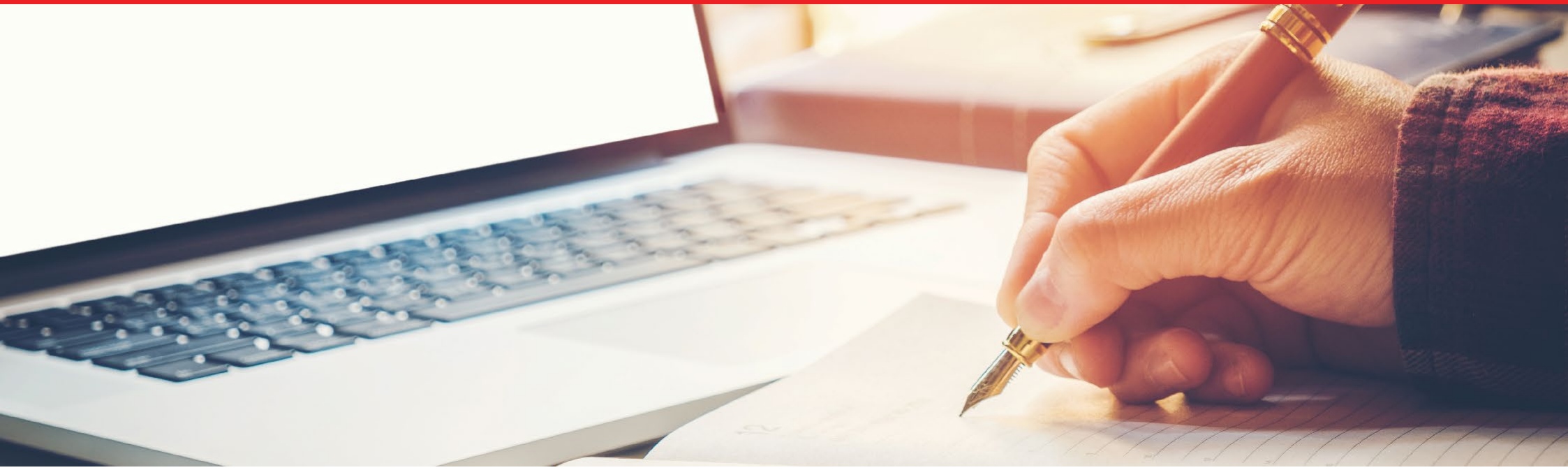
As part of our training programmes, we offer learning and awareness to our employees and to our supply chain and 87% of employees in their first year of employment in 2022/2023 have been trained. We raise awareness through visual reminders, managers briefings, and internal communications.

Monitoring and workforce engagement

Number of home address checks identified as needed	Nil
Number of home addresses investigated	Nil
Number of modern slavery incidents/ concerns identified	Nil
Number of modern slavery incidents/ concerns identified	Nil
Site visits conducted to raise awareness of modern slavery and reporting mechanisms	48

Policy review and audit

Modern Slavery Policy reviewed and updated for the forthcoming year	Yes
Annual risk assessment conducted	Yes
Number of 'red' actions identified	Nil



OUR JOURNEY

We understand that the risk of modern slavery and human trafficking is not static, and we must continue to improve our mitigation in the years ahead to ensure the company is alert to, and acts upon, emerging industry risks. As part of our continued commitment to improving compliance with the Modern Slavery Act 2015 we will continually monitor and review our policies. We will also continue to monitor our practices supply chain activities and improve our staff training and awareness programmes via a working group set up explicitly for this purpose. We have amended our pre-qualification questionnaires, highlighting our requirements in respect of modern slavery and the results have been evaluated. Whilst no risks have been identified, we will continue to monitor our supply chain.

Actions that we commit to this year:

- To further embed our comprehensive Modern Slavery Training for anyone involved in procurement or in the management of contracts that use subcontracted labour
- To improve supplier engagement and promote FM Conway's zero tolerance of modern slavery through a bespoke supplier communications campaign, so that we can report on, learn from, and to highlight our approach to modern slavery and the requirements of our supply chain at our supplier events to be held during the year.
- To re-energise our communications campaign highlighting awareness of modern slavery across our business through visual reminders, managers briefings and company wide communications.

APPROVAL

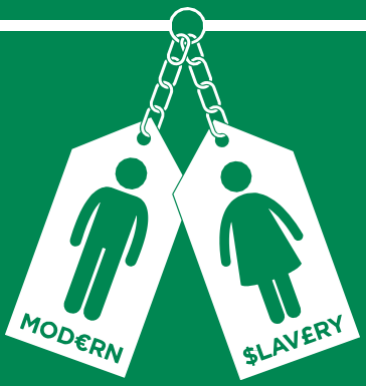
This statement has been approved by the Board of FM Conway and is signed on its behalf.



Joanne Conway
Chair and Chief Executive Officer

1 Subsidiaries: F.M. Conway Building and Maintenance Limited; Hawbury Cleansing Limited; The London Paving Company Limited; Heathrow Asphalt Limited; Berkshire Macadams Limited; Hampshire Macadams Limited; United Construction Materials Limited; United Asphalt Limited; United Asphalt (Theale) Limited; United Asphalt (Croydon) Limited; United Asphalt Contracting Limited; United Concrete Limited; 4 Vector Limited.

MODERN **SLAVERY** STATEMENT 31 MARCH 2023



CARE

As a family business we act with care and compassion

EXCELLENCE

Great people delivering great work, always

INTEGRITY

A business committed to doing the right thing

INNOVATION

Our passion is to always find a better way