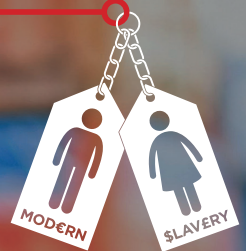


# MODERN SLAVERY

Statement 31 March 2024



FM Conway: Modern Slavery Statement 31 March 2024



# 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 2024. 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.



Scan QR code to anonymously use our reporting app

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***IF YOU HAVE ANY CONCERNS, USE OUR SPEAKOUT APP***

# SLAVERY IS CLOSER THAN YOU THINK.



*You could save someone from slavery just by spotting the signs and reporting your concerns*

# 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 combine our in-house Consultancy team with frontline operational excellence, to ensure we inspect, design, build, enhance, and maintain essential infrastructure services for the community.

The FM Conway Group's turnover (*including its subsidiaries*) for the year ending 31 March 2024 was £579 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 use approximately 1,500 unique suppliers in each calendar year. We continue to target our direct spend in low-risk environments and in 2023/24, less than 0.005% of our direct total external 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 as higher risk (through our risk assessments).

**WORKING  
BETTER  
TOGETHER**





# OUR POLICIES

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.

This year, we have reviewed our Child Labour Policy to ensure compliance for our own business and all our suppliers with the standards set out by the International Labour Organisation's Conventions 138 and 182 with regard to 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 forced, 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.

We regularly brief our workforce in respect to the company's 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, which includes 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.

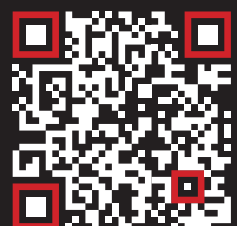
Should any future audit elicit evidence of non-compliance with the standards we have established, we support our suppliers to achieve improvement and adherence to our Key Performance Indicators (KPIs); in some cases, we accept that this may not be possible, and our business relationship may need to be 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 are fully investigated - 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.*





Scan QR code for  
an overview of the  
Modern Slavery Act:



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# MODERN SLAVERY

TRAINING AND STAFF  
AWARENESS





All employees undertake Modern Slavery Training when they join the business as part of their induction; thereafter, regular 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. During the financial year ending March 2024, 80% of our employees had recompleted the modern slavery training module.

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.





[Home](#) > [Contact Us](#)

## Contact Us

**PUBLIC AWARENESS**

## 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](#)



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](#)



All of our mechanisms for raising concerns, making suggestions or reporting issues are: Speak Out, Near Miss, and the Big Idea.

These are our outward-facing apps 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>

# MONITORING OUR EFFECTIVENESS IN COMBATTING SLAVERY AND HUMAN TRAFFICKING

## MONITORING & 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	50

## POLICY REVIEW & AUDIT

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

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

As part of our ongoing commitment to combatting 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 mitigate 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. We raise awareness through visual reminders, manager briefings, and internal communications.



# 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 highlight our approach to modern slavery and the requirements of our supply chain at our supplier events to be held during the year
- To improve the quality and regularity of our communication campaigns in respect of modern slavery



# APPROVAL

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

**Joanne Conway**  
Executive Group Chair and CEO



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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; Toppesfield Limited - (*separate Modern Slavery Statement completed*).

# MODERN SLAVERY

Statement 31 March 2024



## CARE

As a family business we act  
with care and compassion



## EXCELLENCE

Great people delivering  
great work, always



## INTEGRITY

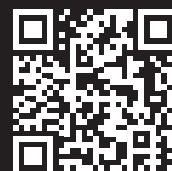
A business committed to  
doing the right thing



## INNOVATION

Our passion is to always  
find a better way

**SPEAK<sup>OUT</sup>**



Scan QR code to  
anonymously use our  
reporting app