

# Slavery and human trafficking policy statement

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**This policy statement sets out the approach Mace Group and its subsidiaries ('Mace') has taken to date, and those that Mace intends to take over the 2019 financial year, with the aim of ensuring that modern slavery or human trafficking is not taking place within our business or within our supply chain.**

## Mace structure, business and supply chain

All Mace Group companies rely upon this statement, where necessary, for the purpose of complying with their individual annual reporting requirements of the Modern Slavery Act 2015. The approach and processes referred to within the statement are relevant to all Group companies and Mace will continue to monitor performance in complying with the Act's requirements as a basis for future annual statements.

Mace is an international consultancy and construction company, providing programme and project management, cost consultancy, construction delivery and facilities management services. Mace works from five strategic hubs in Europe, Middle East and North Africa, the Americas, Asia Pacific and Sub-Sahara Africa. Our global supply chain is comprised of contractors, service providers, producers of materials and manufacturers of a variety of mechanical, electrical and other products used in professional services and the construction process.

Integrity is one of the core values of Mace. Mace is committed to being a responsible business and to upholding high ethical standards in all our operations, including those provided by our supply chains, around the world.

Mace operates across a range of business sectors and services, and our approach to pro-actively addressing the risks of modern slavery reflects local context and the service Mace offers. The four principal areas of business operations are:

- **Develop** – responsible for procuring and managing a diverse supply chain including professional teams, contractors and operators
- **Consult** – responsible for project management and working with clients, overseeing design and procurement teams and managing client requirements and specifications
- **Construct** (including Mace Interiors & Mace MEP) – responsible for managing contractors and suppliers (materials and labour) in the supply chain and the on-site workforce
- **Operate** (Mace Macro) – responsible for facilities management staff and employed to procure and supervise suppliers on behalf of our clients

Our direct responsibilities under the Act are within Develop, Construct and Operate. In the consultancy business the responsibilities lie primarily with our clients and their directly contracted delivery partners.

Our primary risk area is within the highly tiered supply chain structure relating to construction delivery. Therefore, achieving transparency of labour employment arrangements and sourcing of materials are key challenges.

The Chief Executive, Mark Reynolds, is the Group Board member responsible for oversight of the Mace approach to eradicating modern slavery from business operations. The Responsible Business (RB) team supports implementation of the Mace approach to tackling modern slavery. The RB team works across our different business sectors, geographies and services.

Mace has working relationships with unions and police forces around the UK in relation to preventing modern slavery and works alongside charities like Hope for Justice and Sedex to help implement our approach.

## Mace policies in relation to slavery and human trafficking

Mace has made a number of commitments, and developed policies, to help us eradicate modern slavery. These include:-

- Management systems ISO9001:2015, ISO14001:2015 and OHSAS18001:2007; which include the procedures and guidance documents outlined below
- External facing Slavery and Human Trafficking Policy Statement Ref MG-ENV-PL-009
- Internal facing policy Ref MG-ENV-PL-002
- Mace Responsible Business Strategy 2022
- MG-ENV-GD-077 Modern Slavery – Guidance on Supervision referenced in AG0260
- MG-ENV-GD-076 Modern Slavery – Guidance on Procurement referenced in MG-ENV-PR-040 / AG0315
- Master Subcontract Annex MP-PC-FM-006 – covering minimum contract requirements tackling modern slavery
- AG0315 - Sustainability Management Activity Instruction
- Responsible Business Construction Delivery Procedures & Guidance - MG-ENV-PR-040

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## Identification of risks together with steps taken to prevent and manage those risks and due diligence processes in relation to slavery and human trafficking in business and supply chains

The Global Slavery Index provides significant evidence that labour standards risks could be present in construction and property supply chains, in the production of construction materials, delivery of construction activities and through the provision of professional services equipment such as laptops and phones. To identify and mitigate the risks of slavery and human trafficking, Mace makes informed decisions regarding the procurement and management of labour, goods and services, utilising the following:

- Clear definition and contractual terms setting out our expectations of our suppliers (as listed in our policies listed above)
- Identification of issues and risks (using Supplier Ethical Data Exchange – Sedex product and sector risk-profiling) to inform procurement decisions
- Achilles Building Confidence and other prequalification tools to assess UK contractor and supplier compliance; and further due diligence of international suppliers using Sedex. These tools assess suppliers against labour standards, health and safety, environmental and business ethics criteria, identifying issues and risks.
- Training and supplier development
- Compulsory training for all Mace staff and construction supplier leadership teams on slave labour and human trafficking risks and how to spot the signs of potential issues
- Collaboration with our clients, peers and suppliers (Mace is a member of the Gang Master Labour Abuse Authority construction protocol)

Where Mace acts in a consultancy capacity, Mace advises our clients of the requirements of the 2015 Act and provides relevant guidance on the associated modern slavery risks in their supply chains.

Where staff have concerns around issues of forced labour, human rights, recruitment practices or exploitation, they are encouraged and expected to report them to management via a confidential phone number or online reporting service. This is part of the Mace Speak Up policy operated by Safecall. All reports will be investigated by Safecall and the Mace Group Legal Director.

## 2018 Steps taken

The steps Mace has taken towards eradicating modern slavery covers four main work streams:

### 1. On-site engagement on Mace construction sites

- a. Worked with the Hope for Justice charity to provide worker engagement sessions to support potential victims
- b. Signatory to the Construction Protocol proposed by the Gang masters Labour Abuse Authority (GLAA). The protocol calls for industry to work together on tackling modern slavery
- c. Mace promoted the use of the Unseen charity Modern Slavery reporting phone app until the Mace Speak Up policy was launched

- d. Distributed multi-lingual posters on-site (with help from online sources such as specialist organisation Stronger Together)
- e. Completed on-site assurance audits using programmes such as Achilles worker engagement surveys and SMETA (Sedex Member Ethical Trade Audit)
- f. Promoted the use of the above materials to our consultancy clients

## 2. Supply chain risk assessment

Mace has used Sedex to map our supply chain modern slavery risks. In 2018 Mace increased the number of our suppliers registered on the platform from 127 to 191. Mace used the Sedex platform to help inform our procurement teams of potential risks specific to the countries they buy from. Using Sedex data, Mace identified the risks associated with products and services Mace uses through our everyday operations. Using this information, Mace has been able to highlight the risks that procurement teams should be aware of prior to placing an order and enable more probing pre-qualification questions to inform procurement decisions.

### 2018 highlights include:

- a. 191 of our direct suppliers are signed up to Sedex
- b. Every Mace construction site created a risk rating log (from Sedex risk module) of first tier suppliers.
- c. The responsible business team used the Sedex supplier pre-screen risk assessment tool to enable informed construction procurement decisions about the risk of modern slavery in the supply chain
- d. Mace encouraged our second and third tier of supply chain to sign up to Sedex
- e. Mace undertook a series of SMETA audits on suppliers who signed up to Sedex
- f. Mace promoted the use of Sedex to Consult clients

## 3. Working with labour agencies

- a. Engaged with key labour agencies on best practice for staff on-boarding
- b. Explored the use of *Cleanview* for potential future responsible recruitment certification

## 4. Training and capacity building

(See Training and Capacity Building section below)

Where any issues are identified, Mace works with suppliers to seek resolution through training and development. If the issue is deemed serious and/or is not capable of remediation, Mace will remove the supplier from our supply chain unless and until the issue is fully resolved.

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## Effectiveness in ensuring that slavery and human trafficking is not taking place in business or supply chains, measured against appropriate KPIs

Our responsible business strategy contains KPIs, which link to the eradication of modern slavery, including:-

### Construct

- 100% of directly procured construction materials will be responsibly sourced by 2022, and transparency of provenance secured for 80% of all other materials, goods and services.
- 100% tier 1 contractors sign up to Sedex by 2022 and:
  - 50% sign up of Tier 2 suppliers
  - Every project will use the Sedex pre-screen risk assessment tool to inform procurement decisions
  - Every project will maintain a risk log of existing suppliers using the Sedex risk assessment module
  - SMETA audits will be performed on high risk suppliers
- Projects will host and run Hope for Justice Surgeries to encourage employee engagement
- Recruitment agencies will be certified to a responsible recruitment standard by 2022 and will sign up to responsible recruiter principles
- Mace will conduct worker modern slavery surveys on projects
- A system such as PpAC-iD (Passport Authentication Check) to improve/ automate checking of employees' rights to work will be adopted

### All Mace activities

- Mace will investigate all reported incidents and take the appropriate action
- 100% of Mace staff will complete the Modern Slavery E-learning training

### Training and capacity building

Our E-Learning module was launched in 2017, and forms one of the compulsory modules to be undertaken during new starter probationary periods. This online training module was also rolled out to our existing global workforce. By end 2018, 91% of all staff (directly employed and contractors) had completed the course. This module is further reinforced through other training and initiatives that have been rolled out throughout Mace including:-

- Inclusion of modern slavery learning in Sustainable Construction training, which is mandatory for all Mace teams working in construction and consultancy
- The charity, Hope for Justice, has provided awareness training and worker surgeries for Mace construction sites
- Provision of multi-language posters and helpline information on all Mace construction sites
- Inclusion of modern slavery content in the Mace company induction for all new starters

- Working with key stakeholders through the Gangmasters and Labour Abuse Authority (GLAA) to produce industry standard induction videos
- Addition of modern slavery issues to our whistleblowing and escalation processes in our Speak Up policy.

### 2019 plans

Further to the initiatives in the section above, in 2019, Mace plans to continue our work under the four key work streams. Activities will include:

- A series of Mace Business School events for our construct supply chain on eradicating modern slavery
- Continued work with GLAA to provide industry standard induction slides and induction video
- Continued promotion of Sedex sign up of second and third tier suppliers
- Creation of additional risk information for products and services to allow for informed procurement decisions
- Use of the Sedex pre-screen tool to inform decisions
- Further SMETA audits and internal audits on modern slavery
- More Hope for Justice work engagement surgeries
- Increased use of document checkers to combat forged documents and improve workers access to documentation

During 2019, Mace intends to increase workforce engagement, both within our own operations and throughout our supply chains to create open and transparent forums that will allow site workforces to raise issues around modern slavery and human trafficking.

Mace will continue to use Sedex to map risks throughout 2019, with a greater focus on the lower tiers of our supply chain. Mace will also build on client and supply chain partnerships developed to date.

### About this policy statement

This policy statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Mace's slavery and human trafficking statement for the financial year ending 31 December 2018.

### For and on behalf of the board



**Mark Reynolds**  
Chief Executive  
February 2019