

Black & Veatch (U.K.) Limited - UK/Europe Policy on Modern Slavery & Labour Exploitation (“**UK Policy**”) (including guidance for Suppliers)

Introduction

The Black & Veatch Group, which has its Principal Office in Overland Park, Kansas, USA (“the Black & Veatch Group”) is committed to ensuring that all aspects of its activities throughout the world are conducted in a fair, honest and respectful manner as espoused in its Core Values of **Integrity, Accountability and Respect** and in accordance with its Code of Conduct to which every employee is committed. In 2016 the Black & Veatch Group adopted Compliance Practice CP 1.02.06 (“the Group Policy”) implementing specific Anti-Slavery and Human Trafficking policies and procedures which apply to all Black & Veatch Group activities and those of the Black & Veatch Group’s subcontractors and suppliers. The Black & Veatch Group will not tolerate abuses of human rights including forced or compulsory labour, servitude or human trafficking practices.

The UK Policy has been adopted by the Board of Black & Veatch (U.K.) Limited to supplement and endorse the Black & Veatch Group Policy in a manner which specifically addresses requirements for compliance by operations of the Black & Veatch Group in the UK following the coming into force of the **Modern Slavery Act 2015** (“the 2015 Act”). In particular the UK Policy requires subcontractors and suppliers to the Black & Veatch Group’s operations in the UK and Europe to conform with the UK Policy and then to be able to provide details of the actions they are taking to ensure labour exploitation, slavery and human trafficking are not taking place in any part of their operations or supply chain.

Modern Slavery

Modern slavery is a brutal form of abuse, often undertaken by organised crime in which people are treated as commodities and exploited for criminal gain. The International Labour Organisation (ILO) estimates that 21 million men, women and children are working in conditions of modern slavery-including trafficked persons. The vast majority of these people are in the supply chains of legitimate industries.

The 2015 Act

- Consolidates and clarifies the existing offences of slavery and human trafficking whilst increasing the maximum penalty for such offences,
- Introduces measures focused on supporting and protecting victims,
- Establishes new civil preventative orders,
- Introduces new enforcement powers in relation to ships,
- Establishes an office of Independent Anti-Slavery Commissioner,
- Specifies certain businesses must disclose steps being undertaken to eliminate slavery and trafficking from their businesses and supply chains.

Organisations operating commercially with a global group turnover of £36 million per annum are required by the 2015 Act, to prepare and publish an annual slavery and human trafficking statement. The purpose of the statement is to set out what an organisation has done to prevent modern slavery in connection with its activities. It is not a statement confirming there is no modern slavery anywhere in the business or supply chain.

Clear policies demonstrate an organisation's commitment to this issue and ensure that appropriate and coordinated action is taken throughout its business. Such policies should include a provision that all employees in the organisation and the organisation's supply chain understand how to prevent or identify exploitation. Additionally the policies should provide information about the initial steps to be taken when behaviour which seems to constitute modern slavery is identified and who to contact.

The UK Policy

Black & Veatch (U.K.) Limited, the entity of the Black & Veatch Group through which the Black & Veatch Group principally operates in the UK and Europe, is committed to complying with the letter and intent of the 2015 Act in all aspects of its business.

The Core Values of the Black & Veatch Group compel Black & Veatch (U.K.) Limited (in common with the rest of the Black & Veatch Group) to take a strong moral position with regard to any such illicit practices. Black & Veatch (U.K.) Limited will not tolerate any form of modern slavery or labour exploitation and expects its business partners and supply chain to adhere to the same standards.

Every employee/professional of Black & Veatch (U.K.) Limited is responsible for reading, understanding and complying with the UK Policy and shall complete any certification or training required of them.

Managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with the UK Policy and complete any certification or training required of them.

Employees and Managers shall assist Internal Audit with monitoring, auditing of compliance, and other measures to ensure that the conduct across Black & Veatch (U.K.) Limited is consistent with the UK Policy.

All Contractors, subcontractors and co-venturers of Black & Veatch (U.K.) Limited will be required to agree to abide by the UK Policy.

Any officer, director, employee or contractor not adhering to the standards set out in the UK Policy or not diligently following-up when there is reason to believe a violation has occurred is acting in a manner that is expressly unauthorised by Black & Veatch (U.K.) Limited and therefore outside the scope of his or her employment. Appropriate disciplinary action will be applied in that event.

Arrangements will be put in place for the principles of the UK Policy to be incorporated into the Black & Veatch procurement and supply chain management systems.

Guidance for suppliers/subcontractors as regards compliance with this Policy

Potential Exploitation of Labour

Subcontractors and suppliers should:

- afford their employees the freedom to choose to work for them. Employees should be free to leave their employer after reasonable notice is served. Suppliers should not use forced, bonded or non-voluntary prison labour;
- demonstrate a commitment to equality of opportunity for individuals and groups enabling them to live their lives free from discrimination and oppression;
- offer working hours to their staff which are compliant with national laws or industry standards;
- under no circumstances abuse or intimidate employees ensuring appropriate and accessible disciplinary, grievance and appeal procedures are in place;
- work within the laws of the country in which they operate;
- take appropriate measures to ensure the health and safety of their workforce and the wider public;
- offer wages and benefits that at the very least meet relevant industry benchmarks or national legal standards; and
- be alert to the possibility that contractors and sub-contractors (or the agencies supplying labour) could find themselves targeted by unscrupulous gangmasters who may be offering a ready supply of labour at unrealistic rates.

Assessing and Managing Risk

Subcontractors and Suppliers should ensure risk assessment policies and procedures are proportionate to the organisation's and its supply chain's size, structure, location of activities, and nature of business. By identifying relevant information from internal and external sources they will be able to undertake effective risk assessments and appropriate review of those risks.

Organisations should then decide how identified risks can be investigated, and where issues are found, how they can best be remediated or mitigated through activities such as industry collaboration or improved purchasing practices. Training the organisation's leadership and employees to develop the skills and knowledge to understand and support risk prevention and remediation can greatly assist.

Offences under the 2015 Act

Slavery and human trafficking are criminal offences, it is essential that businesses working with Black & Veatch understand the offences and do not commit a breach. It is critical to understand the many implications the 2015 Act has for all suppliers and subcontractors.

It is suggested such businesses should review supply chain processes and contracts on a regular basis in order to ensure they are seeking to eliminate the opportunity for these offences to be committed their business and/or their supply chain.

Enforcement in relation to Maritime transport

The 2015 Act provides additional powers for UK law enforcement agencies to investigate suspected slavery and human trafficking at sea, for the purpose of preventing, detecting, investigating or prosecuting a human trafficking or slavery offence. The 2015 Act also sets out provisions where UK law enforcement agencies can pursue ships in foreign waters.

If suppliers or subcontractors to Black & Veatch or their supply chain use ships then the relevant considerations set out in the 2015 Act must be fully understood and taken into consideration through operating processes and contracts.

Victims or potential victims

The 2015 Act provides a defence for slavery or trafficking victims, which is intended to encourage victims to come forward and give evidence without fear of being convicted for offences they may have committed in connection with, as a part of or during their slavery or trafficking. A person is not guilty of that offence if they commit the offence because they were compelled to do so as a result of slavery or relevant exploitation. The 2015 Act also sets up support processes for victims.

Suppliers and subcontractors to Black & Veatch should set up appropriate processes to facilitate employees being able to report suspected offences under the 2015 Act. Contracts of employment and HR policies within such organisations should be reviewed to ensure compliance and best practice for employees.

Pre-employment checks

All subcontractors and suppliers to Black & Veatch, as employers involved in the construction industry, should make proper background checks on direct employees and/or the agencies which supply them with labour. Where appropriate, guidance can be sought from The Association of Labour Providers, the Recruitment and Employment Confederation and the Gangmasters Licensing Authority.

Terms and conditions of employment

All subcontractors and suppliers to Black & Veatch should ensure that all staff have a written contract of employment with the organisation or be aware of the terms applied to any agency workers and check that such employees or workers have not been forced to pay any direct or indirect fees to others in the process of obtaining work.

In addition, all subcontractors and suppliers to Black & Veatch should make sure directly employed or agency staff working in the UK are legally able to work in the UK.

Wages

All subcontractors and suppliers to Black & Veatch should ensure the wages paid to their direct or agency workers are received by such workers. This will involve avoiding cash in hand and cheque arrangements and being aware that workers may be forced into debt and have bank accounts controlled by exploiters. Consider if there is a group of workers who have their wages paid into the same bank account? This may be sign of an illegal gangmaster collecting all their wages. Are they having wages taken from them for accommodation, food or to repay supposed debt?

Shared accommodation

All subcontractors and suppliers to Black & Veatch should check the names and addresses of those working for them. If it is ascertained that a number of people without family connections have the same address it may indicate high shared occupancy, which is often a factor for those being exploited.

Statutory rights

All subcontractors and suppliers to Black & Veatch should ensure their workers know their statutory rights including sick pay, holiday pay and any other benefits to which they may be entitled.

Assess quotes and fees

All subcontractors and suppliers to Black & Veatch should adopt indicative pricing statistics to assess quotations and fees from agencies offering or charging suspiciously low rates.

Potential victims – hints on identification

All subcontractors and suppliers to Black & Veatch should be alert to the following which may indicate breaches of the 2015 Act:

- A person is not in possession of their legal documents (passport, identification and their own bank account details) or these are being held by someone else. Victims will often be forced to use false or forged identity documents.
- A group of workers is dropped off or picked up at unusual times of the day, and they appear to all be taken to the same property
- A person looks malnourished, unkempt, or appears withdrawn. Perhaps the person is or appears regularly to be suffering physical injuries. The person appears to have old or untreated injuries and delays seeing a healthcare professional. The person is vague, reluctant or inconsistent in explaining how the injuries occurred.
- The person has few personal possessions and often wears the same clothes which may also be regarded as unsuitable for their work.

- The person is withdrawn or appears frightened, unable to answer questions directed at them or to speak for themselves and/or an accompanying third party speaks for them. If they do speak, they are confused in the information they provide, they appear under the control/influence of others and rarely interact with colleagues.
- The person is afraid of the authorities (police, immigration, the tax office) perhaps because they are scared of being excluded from the UK and/or work or what might happen to their families?
- The person appears to consider him/herself to be in debt to someone or in a situation of dependence to an unrelated person.

If you suspect someone of being subject to unlawful control or being trafficked

- Call the Police 101 non-emergency number, or if the person is in immediate danger or is under 18 then call 999 as a matter of urgency.
- anonymously report it online.
- Contact “Crimestoppers” anonymously on 0800 555 111
- Any Black & Veatch professional or company representative and all subcontractors and any supplier to Black & Veatch that identifies a violation of the 2015 Act or this Policy in connection with Black & Veatch projects must promptly notify Black & Veatch by reporting the incident to an appropriate senior manager or by contacting the Black & Veatch Group’s Compliance and Alert Line at 001-800-381-2372.

Adopted by a resolution passed at a meeting of the Board of

Black & Veatch (U.K.) Limited on 23rd October 2024