

Modern Slavery and Human Trafficking Statement

HOCHTIEF (UK) Construction Limited (hereinafter referred to as "HOCHTIEF") is a Civil Engineering contractor, delivering complex infrastructure projects within the UK.

HOCHTIEF is fully committed to complying with the Modern Slavery Act 2015 and taking the necessary steps to prevent slavery and human trafficking in our corporate activities, and to ensuring that our supply chain is free from slavery and human trafficking.

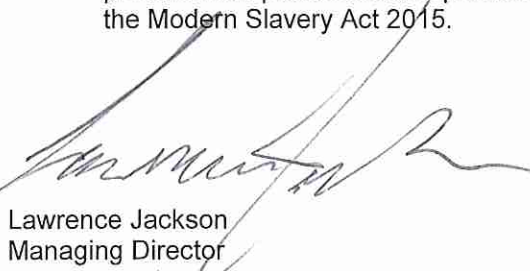
This statement is supported by the HOCHTIEF Supply Chain Code of Conduct, which outlines our commitment to conduct our business to the highest standards of ethics. The HOCHTIEF Supply Chain Code of Conduct is integral to all supplier and sub-contract contracts, which sets out overall standards and commitment towards anti-corruption, environmental protection, legal compliance and ethical conduct.

During financial year 1st April 2017 to 31st March 2018, HOCHTIEF carried out the following steps:

- Reviewed our procurement processes and procedures and made changes, in accordance with guidance being developed with the Supply Chain School for the construction industry.
- Provided communication of details of the Modern Slavery Act 2015 through an awareness-raising programme to all employees to ensure all employees understand the importance of recognising modern slavery and human trafficking in our supply chain and business.
- Updated our supply chain pre-qualification questionnaires to include specific questions on modern slavery and human trafficking.
- Updated template commercial agreements and subcontract conditions to include an obligation on our supply chain to comply with the Act and ensure that their supply chain will too.

HOCHTIEF recognises we have a responsibility to take a robust approach to slavery and human trafficking, and as a minimum, during the financial year 1st April 2018 to 31st March 2019, the following further steps will be taken:

- HOCHTIEF will seek to work in collaboration with all supply chain partners to tackle and combat the threat of human trafficking and modern slavery throughout our supply chain and our projects, in accordance with international environmental, social and ethical standards. We will provide guidance requiring their compliance and an expectation they apply these principles throughout their sphere of responsibility in line with our procurement process and procedure.
- Continue to roll out training for all existing and new staff members on the risks associated with modern slavery and human trafficking in our supply chain.
- Carry out audits on our supply chain to highlight possible areas for improvement as well as sharing best practice. Continue to do due diligence checks on our current and future suppliers and subcontractors, covering compliance with HOCHTIEF Code of Conduct, equality and diversity policies alongside a number of requirements around compliance and corporate responsibility. This enables HOCHTIEF to evaluate and keep updated a potential suppliers suitability to provide materials or services to HOCHTIEF and our customers.
- Provide training and guidance to key employees, Heads of Departments and Directors on HOCHTIEF procurement processes and procedures (including recruitment and selection), which will incorporate the Modern Slavery Act 2015.



Lawrence Jackson
Managing Director
2 August 2019