## **Modern Slavery and Human Trafficking Policy**



HOCHTIEF (UK) Construction Limited (hereinafter referred to as "HOCHTIEF") recognises that we have a responsibility to take a robust approach to modern slavery and human trafficking.

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.

As a minimum the following 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.

We will also ...

- Continue to roll out training and information 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 on 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.

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

We will review our approach to anti slavery and human trafficking annually and this review will include a review of this policy.

Lawrence Jackson

Managing Director