

Modern slavery and human trafficking policy statement

This policy statement sets out the approach Mace Group and its subsidiaries (“Mace”) has taken to date and those Mace intends to take throughout the 2023 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 four strategic hubs in Europe, Middle East and Africa, the Americas, Asia Pacific and India. Our global supply chain comprises contractors, service providers, producers of materials and manufacturers of a variety of 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 upholding high ethical standards as well as being a catalyst for positive change 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. Our four principal areas of business operations are as follows:

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

Our direct responsibilities under the Act cover Develop, Construct and Operate. In Consult 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. Our secondary risk area would be within our global Operate supply chain which carries higher risk in certain countries and service categories making achieving transparency of labour employment arrangements and sourcing of materials a key challenge.

The Chairman & Group Chief Executive, Mark Reynolds, is the Mace Executive Board member responsible for oversight of the Mace approach to eradicating modern slavery from business operations. The Responsible Business (RB) team, procurement team, legal team, and human resources team each support implementation of the Mace approach to tackling modern slavery. Each of these teams 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 partners such as EcoVadis, &Wider as well as charities such as Hope for Justice (Slave free Alliance) and Sedex to help implement our approach.

Mace policies in relation to slavery and human trafficking

Mace has made several commitments and developed policies designed to help us eradicate modern slavery. These include:

- Management systems ISO9001:2015, ISO14001:2015 and OHSAS18001:2007; which include 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
- 2026 Mace Business Strategy
- 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
- Mace Speak Up whistleblowing reporting service and supporting procedures
- Mace Suppliers Code of Conduct which all Mace suppliers must comply with.

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.

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- 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 annual 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).
- Mace Speak Up whistleblowing reporting service and supporting procedures.

Where Mace acts in a Consult capacity, Mace advises our clients of the 2015 Act requirements 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 concerns to management via a confidential phone number or online reporting service. This is part of the Mace Speak Up policy supported by Safecall. All reports will be investigated by a designated team coordinated by the Group Company Secretary.

2022 key steps taken

- Slave free Alliance Construct site assessments and follow up activity
- Each Mace Engine (our operating entities) and Group Services nominated a responsible individual for tackling modern slavery to form a joint working group created/led by the Group Director for Corporate Strategy
- Construct held Hope for Justice engagement surgeries and Conducted Industrial Relations audits
- Engaged with site workforce on all construct projects, via site wide toolbox talks and workforce consultation meetings, including engagement about Modern slavery awareness
- Engaged with numerous supply contractors to establish their industrial relations arrangements, how they employ their staff and site workforce, discussed Modern Slavery mitigation – what is their policy and process- how is this communicated to the workforce, where required gave guidance and advice including promoting membership of SEDEX
- Continued membership of the Slave free Alliance
- Operate enhanced their standard terms and conditions to reflect best practice
- Operate conducted a number of &Wider direct worker reporting surveys
- Modern Slavery Awareness posters with helpline numbers erected in staff areas in the Operate Client properties
- Operate Supply Chain contracts executed to compel vendors to comply with all Laws relating to anti-slavery, human trafficking laws and illegal worker statutes, regulations and codes.

- Mace has adopted the Common Assessment Standard (CAS) as part of the pre-qualification checks which has a complete section that covers Modern Slavery, and is independently marked by 4 assessment providers.
- Speak up policy updated and launched into the business
- All employees were required to certify their compliance with the Mace Code of Ethics and underlying policies which includes the Modern Slavery Policy

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 until the issue is fully resolved.

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

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

Construction

1. 100% of key materials (eg concrete, steel, plasterboard, timber) is responsibly sourced in 2023.
2. Direct suppliers must certify that all materials they provide are compliant with human trafficking and slavery laws.
3. 100% tier 1 contractors sign up to Sedex by 2026
4. Projects will host and run Hope for Justice Surgeries to encourage employee engagement.
5. Recruitment agencies will be certified to the Joint Industry Board standard and will sign up to responsible recruiter principles.
6. Mace will conduct worker modern slavery surveys on projects.
7. A system such as PpAC-iD (Passport Authentication Check) to improve/automate checking of employees' rights to work will be adopted.

All Mace activities

8. Mace will investigate all reported incidents and take the appropriate action.
9. 100% Mace staff will complete the Modern Slavery e-learning training.

Training and capacity building

Mace's 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. At end 2022, -98% 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 across Mace including:-

- Inclusion of Modern Slavery Learning in Sustainable Construction training, which is mandatory for all Construct and Consult teams.
- The charity, Hope for Justice, has provided awareness training and worker surgeries for construction sites.
- Provision of multi-language posters and helpline information on all construction sites.

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- Inclusion of modern slavery content in the Mace company induction for all new starters.
- Working with key stakeholders through the Gangmasters Labour Abuse Authority (GLAA) to produce industry standard induction videos.
- Addition of modern slavery issues to our whistleblowing and escalation processes in our updated Speak Up policy.

2023 plans

Further to the initiatives in the section above, in 2023, Mace plans to continue our work under the four key work streams. Activities will include:

- A series of eradicating modern slavery Mace Business School events for our construction supply chain partners
- Further industrial relation audits focusing on tackling modern slavery
- Improve communication to project site workforce via the project site induction and ensure relevant Modern Slavery information and awareness is communicated when visiting projects ensuring posters with Modern Slavery information is on display
- Undertake four Slave Free Alliance construct site audits during the year
- Annual EcoVadis scoring with the aim of Gold
- Continued promotion of Sedex and use of Sedex pre-screen tool to inform decisions
- Further SMETA audits and internal audits on modern slavery
- Further Hope for Justice worker engagement surgeries
- Increased use of document checkers to combat forged documents and improve workers' access to documentation.
- During 2023, Mace will 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.
- Strategic Partners to be encouraged to pursue Ethical Employment certification as an add-on to Common Assessment Standard (CAS) prequalification.
- Follow-up supply chain Briefing on Modern Slavery is scheduled for June.
- A survey will be distributed to strategic partners to clarify modern slavery practices used in their supply chain (Tiers 2/3/4).
- Further drive to encourage our Supply Chain to undertake Achilles Ethical Labour Audits.
- Worker engagement surgeries will be organized across the Construct sites.

About this policy statement

This policy statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Mace slavery and human trafficking statement for the financial year ending 31 December 2022.

Approved by the board and signed on their behalf by



Mark Reynolds

Group Chairman and Chief Executive
March 2023