

# Modern Slavery and Human Trafficking Statement



## Introduction

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the steps that Amec Foster Wheeler and its subsidiaries have taken to date to prevent modern slavery in its supply chain.

We have long recognised the harm of slavery and human rights violations. As an international company, we understand the importance of addressing these issues in the way we undertake our business – this is reflected in the culture of our organisation, our company values, and demonstrated through our long-standing approach to sustainability.

## Statement of intent

As a company we address modern slavery from the perspective that ethics and values must drive our actions and behaviours in order to attain real and meaningful compliance. We recognise that we have a duty not to be complicit in any form of slavery. Integral to our company values is to always do the right thing, to act ethically and with integrity, and to care about our communities.

Amec Foster Wheeler is committed to continually improving and enhancing the systems and processes we have in place to avoid complicity in human rights violations related to our operations, including those of our business partners and in our supply chains. We understand that we have a responsibility to be alert to risks in our business and in our wider supply chain, and that this responsibility requires us to act upon any concerns identified.

We have a responsibility to ensure that our own employees, together with the workers in our value chain, are not victims of slavery; whether it is human trafficking or forced and bonded labour. This statement sets out the baseline from which we can continue to drive awareness and implement a programme of ongoing and continuous improvement.

## Our legacy

We have over 150 years of proud heritage in which we have carefully built a reputation for consistently delivering excellence with integrity; this extends to supporting and respecting the protection of internationally proclaimed human rights. We have been a signatory to the UN Global Compact since 2009, this is reflected in our Code of Business Conduct (CoBC) and our Supply Chain Code of Conduct which are aligned to this commitment.

Our [Code of Business Conduct \(CoBC\)](#) is a governing document that guides our employees, and those who work on our behalf and under our direction, in the conduct of our day-to-day business worldwide with the highest standards of ethics. It is equally valid wherever in the world we are operating and with whomever we are working. For more information on the implementation of our Code of Business Conduct please see our [Managing ethics fact sheet](#).

Our [Supply Chain Code of Business Conduct \('Supply Chain Code'\)](#) is aligned to the Code of Business Conduct and makes particular reference to human and labour rights, health, safety and environment, ethics, compliance and legal requirements. Amec Foster Wheeler requires our suppliers to confirm compliance and agreement with our Supply Chain Code. This is more than a paper confirmation, our supplier qualification systems assess our suppliers' abilities to comply with the requirements set out within our Supply Chain Code.

We have in place formal reporting mechanisms which are available to all those who work for or on behalf of us in the form of ethics and compliance officers who are available throughout the organisation. In addition, we have an ethics helpline which is administered by an independent third party and is available 24 hours a day, seven days a week, with the ability to provide support in numerous languages. A formal reporting mechanism is also available to suppliers and other third parties [via our website](#). A detailed annual breakdown of the number of ethical related concerns raised is reported through our [online sustainability reporting](#).

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## About us

## About our supply chain

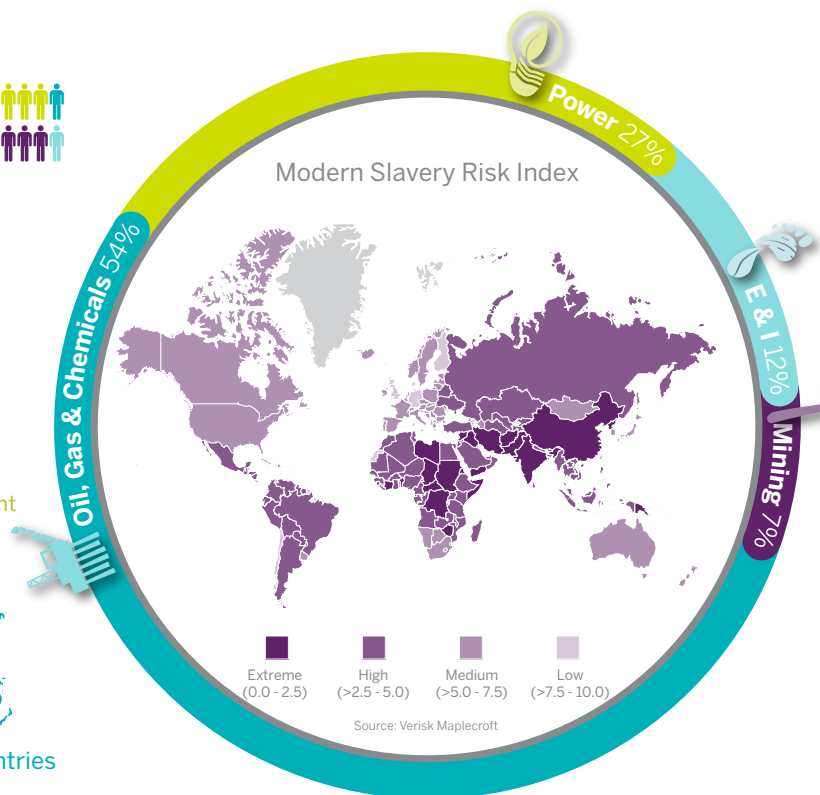
36,000 people worldwide



Providing consultancy, engineering, project management, operations and construction services, project delivery, specialised power equipment



Operating in over 55 countries



Over 11,000 suppliers



Revenue £5.5bn (\$8bn)



Supply of goods and services

## Understanding our projects and our key risk areas

We recognise that the diversity and complexity of our projects across markets and the value chain means that we encounter different degrees of risk relating to modern slavery depending upon where we are positioned in that chain, the type of services we are providing and the contractual relationships we enter into.

We have reviewed the risk levels of our projects and the differing approaches required to manage them in a proportionate and appropriate manner. We have categorised our projects into three areas:

1) Direct management - where we can directly mandate and require our suppliers and subcontractors and their sub-tiers to meet our standards.

- 2) Project Management services - where we manage contractors and other third parties on behalf of our customers, requiring a collaborative approach.
- 3) Procurement services - where we procure on behalf of our customers, necessitating the need to work closely with our customers to build upon their controls and processes.

As part of our existing risk based due diligence procedures, we have identified our third parties - including joint venture partners, subcontractors and those supplying goods, equipment, materials, or performing services - as an area for further attention; particularly in relation to recruitment practices and worker welfare.

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## Enhancing our current practices

Over the past 18 months, we have promoted internally our understanding of the legislation and its implications on our business, and have taken measures to elevate our performance in 2016/17 and longer term by enhancing the systems and processes we already have in place.

### Awareness raising and training

We developed and rolled out an education pack, accessible via our intranet, to help employees understand the legislation, what modern slavery is and how it relates to our business and our supply chain. We have utilised the content to raise awareness amongst our senior leadership teams and including relevant internal functions.

We will roll out via our Academy an online eLearning module to increase awareness amongst our employees to the issues and risks around forced and bonded labour and human trafficking in global supply chains. We have partnered with TRACE (an independent compliance and due diligence firm) to tailor the module to our business, to be launched early 2017.

We have engaged an independent organisation to design and provide more focused training for those employees in roles who have the potential to interface more within these issues, to ensure they understand in more depth the indicators of risk around modern slavery.

### Review of policies and procedures

We have reviewed and are in the process of enhancing our global policies, procedures and processes to ensure they specifically address modern slavery issues; notably, our Supply Chain Code and our existing due diligence procedures. All our policies and procedures are accessible to employees via our online library available on our company intranet.

We are undertaking a review of our existing approach to due diligence and the systems we use to ensure that we have a consolidated company-wide approach that takes into account a comprehensive set of risks (including modern slavery) and that extends to our third party and supply chain relationships.

### Supply chain

We have launched a pilot questionnaire amongst a cross-section of companies in our global supply chain, designed to help us understand how our supply chain is responding to the increasing momentum requiring companies to act on their human rights obligations and commitments. Following a successful pilot, we will use this data to enhance our existing global supply chain registration and qualification processes.

We are also working with an independent third party data and research provider to systematically assess and quantify the risk of modern slavery across our operations

worldwide. This assessment will enable us to proactively identify and prioritise areas in our supply chain that are most exposed to modern slavery moving forward.

### Fair recruitment practices

Amec Foster Wheeler adopts fair recruitment practices globally based on the Employer Pays Principle; this states that the costs of recruitment should be borne by the employer, and never by the worker. While we adopt this principle in all our direct recruiting efforts, our focus moving forward will be on managing our agency partners and their supply chains to ensure full compliance with this principle.

Our roadmap is to drive appropriate agency behaviours and align with our values concerning fair recruitment practices. We are also investigating an enhanced supplier qualification process specific to recruitment agencies. Following this, we will update the language in our global and jurisdictional recruitment and hiring procedures to reflect our position on fair recruitment practices and worker welfare.

### External engagement and collaboration

We have engaged with a number of our customers to understand their expectations of our business on the issues of modern slavery and wider human rights. We have also been involved in this debate through the International Petroleum Industry Environmental Conservation Association (IPIECA). We regularly engage in dialogue with relevant organisations to ensure we are considering wider stakeholder expectations on this topic.

We recognise the need for and the value of collaboration within and across sectors to be able to have meaningful impact on this issue; it is not an issue any company can solve singlehandedly. We openly share our knowledge and experience to help drive positive change in this area. For this reason, we are one of the founding members of Building Responsibly; an emerging non-competitive global business initiative for leading companies in the engineering and construction industry to work together to promote the rights and welfare of workers.

We will continue to participate in Building Responsibly and to take an active role in the key areas of work that will support member companies to address the most complex risks identified in their individual companies by leveraging combined expertise, experience, and networks.

The three priority areas identified are:

- 1) Working and living conditions of workers
- 2) Subcontractor and supply chain practices
- 3) Recruitment practices

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## Governance

Our practices around modern slavery and wider human rights issues are sponsored by a company Executive Director.

A Modern Slavery Working Group was established in 2015. Chaired by the Director of Sustainability, it is a high level panel with cross business line/cross functional/geographic representation. The purpose of the working group is to give effect to our commitment to identify, prevent, detect and remedy modern slavery within our own organisation, our business partners and our supply chain.

## Monitoring and review

The ongoing responsibility to monitor and review the effectiveness of the processes put in place will be with the Modern Slavery Working Group. We will consider specific KPIs to assist the assessment of effectiveness which we will report against within future statements and through our online sustainability reporting.

We acknowledge and welcome the introduction of legislation such as the UK Modern Slavery Act 2015, the Federal Acquisition Regulation (FAR) anti-human trafficking rules for Federal contractors and subcontractors and The California Transparency in Supply Chains that look to elevate practice in the business community on these important issues to eradicate this deplorable practice.

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**Date:** 1 October 2016

A handwritten signature in black ink, appearing to read "Jonathan Lewis".

**Jonathan Lewis**  
Chief Executive Officer