

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

HOCHTIEF (UK) Construction Limited is a Civil Engineering contractor, delivering complex infrastructure projects within the UK.

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

This statement is supported by the HOCHTIEF Code of Conduct, which outlines our commitment to conduct our business to the highest standards of ethics. The HOCHTIEF 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.

HOCHTIEF (UK) Construction Limited recognises we have a responsibility to take a robust approach to slavery and human trafficking, and as a minimum, during financial year 1<sup>st</sup> April 2016 and 31<sup>st</sup> March 2017, the following steps will be taken:

- Review our procurement processes and procedures and make changes if necessary by July 2016.
- Undertake 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 (UK) Construction Limited to evaluate and keep updated a potential suppliers suitability to provide materials or services to HOCHTIEF (UK) Construction Limited.
- Communicate 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 by 30<sup>th</sup> April 2016.
- Provide management guidance to employees to help develop and educate staff on the HOCHTIEF values (Safe, People, Sustainable, Engineering) with the aim of embedding personal responsibility of fair business practices, ethics and labour practices.
- Provide guidance to current suppliers requiring their compliance and an expectation they apply these principles throughout their sphere of responsibility in line with our procurement process and procedure.
- Provide training and guidance to high risk employees, Heads of Departments and Directors on HOCHTIEF procurement processes and procedures (including recruitment and selection), which will incorporate the Modern Slavery Act 2015.

To support these steps, we have a dedicated compliance support team, which consists of involvement from Procurement, Finance, Quality Assurance, Operations, Human Resources and Legal.

This policy will be updated on an annual basis and compliance audits will be undertaken to continually improve our Company processes and procedures to support our commitment to zero tolerance to modern slavery and human trafficking.



**Sally Cox**  
**Managing Director**  
29.03.2016



**Christof Brixel**  
**Chief Financial Officer**

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