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Responsible:	Board of Directors (GF), IMS officer within top management (IMB), BrL
Contributors:	All employees

Description

1. Introduction from the senior management

We are proud of the steps we have taken to combat slavery and human trafficking. We remain committed to improving our practices to combat slavery and human trafficking.

The BeMo Group has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our operation and supply chain. This Statement sets out action taken to increase understanding of all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year ended 31st December 2020.

This statement has been approved by the Board of Directors of BeMo Tunnelling UK Ltd and signed by two directors.

2. Organisation's Structure

We are a company specialised in the construction and refurbishment of civil engineering structures of all kinds.

The Company's sole shareholder is its parent company BeMo Tunnelling GmbH, located in Austria and with a total of six subsidiaries, three branch offices and two registrations (the 'BeMo Group'). The BeMo Group is the leading company for the markets Austria, Germany, UK, USA, and Canada within the Czech construction group Metrostav (for more information on BeMo Tunnelling GmbH visit www.bemo.net/).

The Group has over 532 employees and a global annual turnover of more than €180 M on average.



3. Our business and approach to slavery and human trafficking

BeMo Tunnelling is a specialist in the design and construction of all kinds of underground structures, whether new construction, refurbishment, reinstatement or reconstruction. Our highly qualified and committed team of experts (Project Managers, Construction Managers, Project Engineers, Supervisors, Superintendents and Specialists) is known internationally for its broad scope of technical competence and innovative solutions for the design and delivery of complex and challenging tunnel works. It is our goal to maintain and strengthen our excellent global reputation.

We establish a relationship of trust, cooperation and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references. BeMo Tunnelling UK Ltd. is committed to working within our own business and our supply chain to ensure that we implement a proactive approach to tackling hidden labour exploitation and reducing these practices in our wider supply chain.

4. Due diligence processes for slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our processes reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

	<p align="center">BeMo Tunnelling UK Ltd. Integrated Management System</p>	 Certified IMS Table of Contents IMS Process Model Page 2/4
	<p align="center">LS9FD14 – Modern Slavery and Transparency Statement</p>	

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We have the following systems in place:

- our Integrated Management System (IMS) and Code of Conduct
- risk assessment
- internal steps taken
- supplier due diligence
- an established internal business culture reflecting our values

4.1 Our Integrated Management System (IMS) and Code of Conduct

Our IMS is underpinned by our Code of Conduct (www.bemo.net/wo_files/files/FD13.pdf). In keeping with the principles of the United Nations Global Compact, the Group—within its sphere of influence—recognise the following basic values and adhere to them in our business practices:

- support and respect the protection of internationally proclaimed human rights;
- uphold the freedom of association and the effective recognition of the right to collective bargaining;
- eliminate all forms of forced and compulsory labour and effectively abolish child labour;
- eliminate discrimination in respect of employment and occupation;
- deal cautiously with ecological resources and support a precautionary approach to environmental challenges;
- work against corruption in all its forms, including extortion and bribery.

Furthermore, our established values form the basis for the actions undertaken by all BeMo personnel: keeping our word, reliability, stability and professionalism. The Code of Conduct was updated in 2017 to explicitly cover modern slavery.

BeMo respects the dignity of all its employees and respects each of them as an individual. Their dealings with each other are characterized by mutual respect and fairness. Management shall set an example and especially in conflicts shall be a competent contact partner.

4.2 Risk Assessment

There has not been any change to the way the BeMo Group conducts its business since the initial Modern Slavery risk assessment and no incidents have been recorded. We therefore maintain initial assessment from 2017 and concluded that the most significant risks remain in our material and subcontract procurement, although some risks remain in our site management and recruitment practices. We thus will continue to focus on internal steps and supplier due diligence.

4.3 Internal Steps Taken

To prevent modern slavery within BeMo as an organisation we have undertaken the following steps.

To manage risk for our employees, we carry out mandatory training in relation to our Code of Conduct (including Non-Discrimination Policy).

In addition we have installed a reporting procedure for suspected wrongdoing which includes the installation of a dedicated person, a so-called "Compliance Officer" as part of this procedure. BeMo have additionally employed an external law firm to act as a whistleblowing service. Name and contact details for the whistleblowing service are communicated to all staff.

With BeMo's background rooted in Austria, BeMo have installed a so-called works council. Works council members are individuals who are elected by the workforce of a company to represent the interests of the workforce vis-a-vis the company management. They must be given adequate exemption from duties to carry out their office, receive adequate training to carry out their office and enjoy special dismissal protection. Among other duties they are duty bound to ensure that workers' rights are correctly implemented in an organisation. For this they receive access to necessary documentation and can act as independent grievance handler.

Our employee can seek free advice and information from the company internal Workers Council.

In addition, our employees can seek advice and help from the appointed Safety Representative and or the Occupational Health Professional. Both are obliged to confidentiality.

4.4 Supplier Due Diligence

In relation to our supply chain, there are two main measures. For material suppliers we minimise exposure to the risk of exposure to modern slavery by geographical selection. Additionally, our supply and subcontracts contain provisions for adherence to our Code of Conduct and also a right to audit. As part of our supplier selection process, we ask the supply chain to declare their Corporate Social Responsibility

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(including Modern Slavery) measures. As a minimum we require a confirmation that subcontractor's workers are employed at minimum wage or better.

Most of our suppliers and subcontractors supporting our business are predominantly based in Austria and Germany. In these countries modern slavery and human trafficking is strictly prohibited. BeMo has no suppliers from high risk countries of origin (such countries being determined as high risk by the Global Slavery Index).

Supplier evaluation and frequent audits are part of our IMS. For the assessment of suppliers, subcontractors and/or personnel service providers, a systematic evaluation has to be carried out. In addition to points such as analysing corporate social responsibility, quality of services and deliveries, the evaluation includes points such as price, lifecycle costs, punctuality, reliability, serviceability, technical and economic performance, creativity, health, safety and environmental (HSE) measures, etc.

We also require all those who work for or with us to comply with our Code of Conduct. We also require all factories and premises used in the manufacture and supply of products and services to be compliant with our Code of Conduct. Under our Codes, suppliers are required to comply with all applicable laws, statutes, regulations and codes, from time to time in force, including but not limited to the Act, United Nations Global Compact and the International Labour Organization International Labour Standards.

Appropriate action is taken to investigate and address breaches of our Codes and serious breaches have resulted in removal from our approved supplier list.

4.5 Internal Business Culture

BeMo stands for equal opportunities, diversity, inclusion and respectful togetherness, respecting the dignity and personality of all employees. Dealing with each other is characterised by mutual respect and fairness. The executives and management fulfil their exemplary role and prove themselves to be competent contact persons, especially in conflict situations.

BeMo promotes equal opportunities and diversity. All employees or applicants shall be treated equally with dignity and respect regardless of which sex, marital or family status, age, political ideology, background, religion or belief, sexual orientation, nationality or national or ethnic or social origin and shall also not be at a disadvantage due to any other condition or requirement that is not essential for carrying out the job. The selection, training and promotion of employees is based exclusively on activity-related, job-specific criteria.

5. Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chain, we understand that the risk of modern slavery is not static and we must continue to improve mitigative action throughout the years ahead, with a particular focus on:

- staff awareness to improve understanding of modern slavery and how to spot risk factors (including informing all BeMo employees in newsletter, briefings and/or meetings);
- increasing awareness and building capability within our supply chain to address the risks associated with modern slavery.



Whilst a number of our Group processes have been improved to create a greater understanding of the risks of modern slavery in our own business and our supply chain and how to mitigate this risk, there remains more to do within specific businesses and on site. These will remain our key areas of focus in the coming months and years.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st December 2020.

Applicable Documents

Document no.	Brief Description
FD13	Code of Conduct

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Processor / Date:	Wechner, Lieb, 21.02.2023 <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  Thomas Wechner Director </div> <div style="text-align: center;">  A. Lieb Alexander Lieb Director </div> </div>
Changes to the previous version:	Additions are highlighted in grey