

Modern Slavery and Human Trafficking Statement

This statement sets out the approach Mace Group, including its subsidiaries ('Mace') has taken to date and those Mace intends to take throughout the 2025 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 and construction delivery. Mace works from four strategic hubs in Europe, Middle East and Africa, the Americas, and Asia Pacific which includes 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.

As delivery consultants and construction experts operating across a wide range of markets and sectors, our approach to pro-actively addressing the risks of modern slavery reflects local context and the services Mace offers. Our two principal areas of business operations are as follows:

- **Construct:** (including Fitout and Retrofit, MEP, Logistics) – responsible for managing contractors and suppliers (materials and labour) in the supply chain and the on-site workforce.
- **Consult:** responsible for managing, assuring and delivering client requirements across our four primary service lines of project and programme management, cost and commercial management, PMO and planning, and advisory.

Our direct responsibilities under the Act cover the work we deliver within our Construct Engine, whilst in Consult Engine 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.

The Group Executive Chairman, Mark Reynolds, is the Mace Executive Board member responsible for oversight of the Mace approach to eradicating modern slavery from business operations. The Procurement team, Responsible Business team, Compliance 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 and SEDEX, as well as charities such as Hope for Justice (Slave free Alliance) 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 ISO45001:2015; which include procedures and guidance documents outlined below.
- Modern Slavery and Human Trafficking Policy Statement Ref MG-ENV-PL-009.
- Modern Slavery and Human Trafficking Policy Ref MG-ENV-PL-002.
- 2026 Mace Business Strategy.
- Modern Slavery - Guidance on Supervision MG-ENV-GD-077.
- Modern Slavery - Guidance on Procurement MG-ENV-GD-076.
- Master Subcontract Annex - covering minimum contract requirements tackling modern slavery MP-PC-FM-006.
- Sustainability Management Activity Instruction AG0315
- Responsible Business Construction Delivery Procedures & Guidance - MG-ENV-PR-040.
- Mace Code of Ethics GP-LG-CD-0005.
- Mace Speak Up whistleblowing reporting service and supporting procedures GP-LG-PS-0002.
- Mace Supplier Code of Conduct which all Mace suppliers must comply with GP-SCM-CD-0001.

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.
- Use of prequalification tools aligned with the Common Assessment Standard 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.

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- 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 on Modern Slavery issues
- Mace Speak Up whistleblowing reporting service and supporting procedures.

Where Mace acts in a consultancy capacity, and is required by the client, Mace provides relevant guidance on the associated modern slavery risks in their supply chains in accordance with the 2015 Act.

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 Head of Group Compliance.

2024 key steps taken

- Four independent construction site assessments representing a sample of our UK construction sites were scheduled in 2024.
- Three assessments were undertaken by the Slave free Alliance, the fourth scheduled assessment was delayed until Q1 2025.
- 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.
- Modern Slavery Awareness posters with helpline numbers are displayed on selected noticeboards. and included in the site induction packs.
- 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.
- Applied 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 four assessment providers.
- Speak Up Policy was reviewed and updated.
- All Mace people 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, is measured against appropriate KPIs

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

Construction

1. Key materials (eg concrete, steel, plasterboard, timber) we will seek to source responsibly.
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. Recruitment agencies will be certified to the Joint Industry Board standard and will sign up to responsible recruiter principles.
5. Mace will conduct worker modern slavery surveys on projects.
6. Access Control Systems are utilised to automate checking of employees' rights to work

All Mace activities

7. Mace will investigate all reported incidents and take the appropriate action.
8. 100% of Mace staff will complete the modern slavery e-learning training.

Training and capacity building

Mace's E-Learning module was launched in 2017 and, including regular updates, 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 2024, - 97% 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.
- Inclusion of modern slavery content in the Mace company induction for all new starters.
- Addition of modern slavery issues to our whistleblowing and escalation processes in our updated Speak Up policy.

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2025 plans

Further to the initiatives in the section above, in 2025, Mace plans to continue its work under the four key work streams. Activities will include:

- Further Mace Business School events for our construction supply chain partners to raise awareness of modern slavery.
- 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 assessments during the year.
- Update Ecovadis Assessment to improve our rating.
- Update our UK Government Modern Slavery Assessment (MSAT) to improve our rating and address any identified actions.
- Continued promotion of Sedex and use of Sedex pre-screen tool to inform decisions.
- SMETA audits on modern slavery where risks are identified through the use of SEDEX prescreening and risk assessment.
- Further Hope for Justice worker engagement surgeries.
- Increased use of document checkers to combat forged documents and improve workers' access to documentation.
- Continue to engage the workforce, 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.
- Additional surveys of our supply chain 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 or similar.
- Further worker engagement surgeries will be organized across the construction sites.
- We are improving our data collection channels by adding API data download from Sedex, which will allow us to access modern slavery analytics about our supply chain.
- The API will automate the data transfer from Sedex's database to your internal system, allowing us to improve our decision making while also closely monitor Sedex statuses of our Tier 1 supply chain.

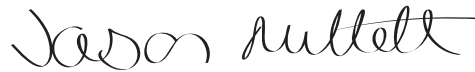
Benefits

- Improved visibility – ability to see suppliers' information such as non-compliances, audit information and self-assessment questionnaire completion/status, in your own systems. Allowing us to analyse Sedex data against our own data.
- Increased productivity – having automated data in one place saves us time and money.
- Analysed trends – we will be able to see historical information on the last five years of our suppliers' audit information – allowing us to analyse and predict trends.

About this statement

This 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 2024.

For and on behalf of the Mace Executive Board



Jason Millett

Group Chief Executive
April 2025