



Fact sheet



amec  
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## Human rights

Amec Foster Wheeler supports and respects the protection of internationally proclaimed human rights. 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 commitment to the UN Global Compact principles since 2009.

### 8 GOOD JOBS AND ECONOMIC GROWTH



#### By 2030

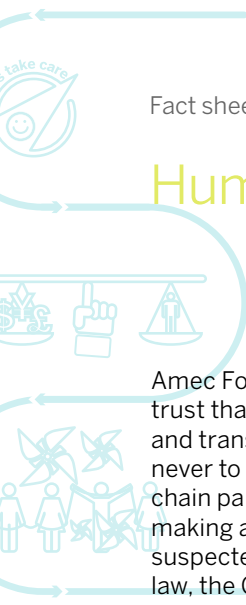
- Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking
- Protect labour rights and promote safe and secure working environments for all workers, including migrant workers

Human rights is embedded in Amec Foster Wheeler’s [Code of Business Conduct](#) (the Code), which is a set of principles to guide us and those who work on our behalf and under our direction in the conduct of our day-to-day business. It is applicable wherever in the world we are operating and whatever we are working on. It is the practical application of our values.

Our [Supply Chain Code of Business Conduct](#) (the Supply Chain Code), recently enhanced with additional human and labour rights clauses, is aligned to the Code. It is our main vehicle for ensuring that our supply chain plays an active role in helping us to achieve our vision, behaves in a way which is consistent with our values and in doing so, helps Amec Foster Wheeler sustain the respect and trust of all our stakeholders.

The Supply Chain Code requires our supply chain partners to notify Amec Foster Wheeler of any alleged, potential, suspected or actual breach of the law, our Code of Business Conduct or our Supply Chain Code via the [EthicsPoint hotline](#). The hotline 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. The Supply Chain Code also places the requirement on our supply chain partners to provide a process for their own employees to report activities inconsistent with our Supply Chain Code.

We also 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**.



## Human rights

Amec Foster Wheeler values the trust that is built upon openness and transparency and commits never to penalise employees, supply chain partners and third parties for making an honest report of potential, suspected or actual breaches of the law, the Code or the Supply Chain Code.

### Modern slavery & human trafficking

Our efforts around modern slavery and human trafficking continue to be a key focus for us, particularly with regards to the UK Modern Slavery Act 2015 and the Federal Acquisition Regulation (FAR) anti-human trafficking rules for US Federal contractors and subcontractors.

In May 2016, we published our **Compliance Plan** prepared in accordance with the US Government's policy on human trafficking and trafficking-related activities. Consistent with FAR 52.222-50(h), it applies to any portion of a US Government contract that Amec Foster Wheeler Environment & Infrastructure, Inc. is awarded for supplies, other than commercially available off-the-shelf items, or services to be performed outside the United States with an estimated valued exceeding \$500,000.

Our first **slavery and human trafficking statement** was published on 10 December 2016 to coincide with Human Rights Day. Our statement fulfils the legal requirements of Section 54 of the UK Modern Slavery Act 2015, outlining the steps that we, as a business, have taken to identify and prevent modern slavery across our operations and

within our wider sphere of influence. In our statement, we acknowledge our responsibility to ensure that our 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 will be the basis from which we will continue to drive awareness of modern slavery and seek to improve our processes.

An internal global, cross-functional working group was established in late 2015 to review our risks, ensure our governance structures are adjusted appropriately and to raise awareness of modern slavery and human trafficking to our employees. The working group also reviewed and improved our existing policies, procedures and systems.

A key priority in 2016 was to raise awareness of the issues pertaining to modern slavery and human trafficking and to build capacity on how to respond to these. 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 utilised the content to raise awareness amongst our senior leadership teams and including relevant internal functions. We also engaged Verité 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.

In 2017, 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.

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. For this reason, we continued to invest our time in the set-up of **Building Responsibly**, an emerging global initiative to help promote the rights and welfare of workers in own operations and the supply chain. This collaborative, industry-led initiative of leading peers in the engineering and construction sector, will be facilitated by Business for Social Responsibility (BSR) with support from Humanity United.

Building Responsibly will enable member companies to further advance their programmes by sharing best practices, agreeing on common approaches and standards, developing tools and engaging clients, civil society, governments and international organisations. Through this initiative, we will align more effectively with regulations and stakeholder expectations, whilst increasing productivity and fostering a better environment for workers.





# Human rights

## Due diligence

We have a number of due diligence processes, including customer due diligence, third party due diligence and project tender reviews, all with the purpose of reviewing and assessing potential risks and ensuring that appropriate mitigation measures are implemented where required.

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

In line with our commitment to fair recruitment practices and ensuring the adoption of the **Employer Pays Principle**, we are also investigating an enhanced supplier qualification process specific to recruitment agencies.

### UN Guiding Principles on Business and Human Rights

We participated in the **2016 UN Forum on Business and Human Rights** in Geneva, providing us with the opportunity to engage with like-minded businesses and a wide range of stakeholders (including government, civil society, investor organisations, trade unions, UN

bodies and academia) on topics that relate to the UN Guiding Principles on Business and Human Rights (UNGPs), as well as issues relating to the Global Goals.

We also attended the **European Business and Human Rights Peer Learning Group Meeting**, a side event organised by the Global Compact for European signatory companies with the participation of the UN Working Group on Business and Human Rights. The theme of the one-day workshop was Access to Remedy in Practice – Understanding and Improving your Grievance Systems.

The learnings from both events have been shared internally. We are currently reviewing how our business can enhance existing policies, processes and procedures to better address the requirements of the UNGPs throughout the lifecycle of our projects.

### Focus areas and KPI's for 2017

Our targets for 2017 support the commitments made within our [2016 Modern Slavery and Human Trafficking Statement](#). Our attention is focused on engagement with employees and awareness of modern slavery and human trafficking risks within our operations and wider sphere of influence i.e. customers, supply chain and joint venture partners.

Recognising the need to improve understanding of the risks amongst key employee groups, we will roll out the eLearning module to relevant staff.

Our continued active involvement with the Building Responsibly initiative throughout 2017 recognises the need for, and value of, collaboration within and across sectors to have meaningful impact on this issue. Continued outreach to NGOs will also ensure we share and learn best practise.

### 2017 KPIs

- >95% of targeted employees are to complete awareness training during 2017 on the issues and risks around forced and bonded labour and human trafficking in global supply chains.
- Continued collaboration and engagement with the industry led 'Building Responsibly' initiative, facilitated by Business for Social Responsibility (BSR) with support from Humanity United.

