

C Vehicle Capability Contract

SLAVERY & HUMAN TRAFFICKING STATEMENT

Financial Year Ending 31 December 2019



Introduction

This Slavery and Human Trafficking Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (“the Act”) relating to Transparency in Supply Chains.

This statement relates to all entities of ALC, namely ALC (Superholdco) Limited; ALC (Holdco) Limited; ALC (SPC) Limited; and ALC (FMC) Limited.

ALC recognises that it has a responsibility to take a robust approach to slavery and human trafficking and indeed takes a zero tolerance approach to non-compliance with the Act in any part of its business or its supply chain.

This Statement sets out the steps ALC has taken to address the risk of slavery and human trafficking within its operations and supply chain.

Organisational Structure

ALC provides and maintains a Tri Service worldwide fleet of deployable engineer construction plant and rough terrain mechanical handling equipment to the British Armed Forces. A full range of support services are also provided including spares support, a technical documentation service and provision of training for operators and maintainers.

ALC is a joint venture between Amey PLC and Babcock International Group PLC.

ALC has around 100 staff and operates mainly in the UK but also has an office in Cyprus. Its Head Office is in Bicester. All staff are employed by either Amey or Babcock and seconded to ALC.

Our Supply Chains

Our supply chains include:

- Plant, vehicles and equipment suppliers
- Subcontractors and various service providers
- Manufacturers and suppliers of goods and materials

We aim to build long terms sustainable relationships with our suppliers encouraging collaborative working and exchange of innovative and good industry practices.

We have in place systems to:

- Evaluate new suppliers as part of the on-boarding process
- Identify and assess potential risk areas in our supply chains
- Monitor potential risk areas in our supply chains

Our supply chain includes approximately 400 suppliers of varying size and expertise and in 2019 we paid in excess of £18m to our supply chain. Whilst most of our suppliers are UK based, we are aware that the supply chain to our suppliers may be based in Europe or, in a few cases, elsewhere in the world.

Our Policy on Slavery and Human Trafficking

We remain committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business with a zero tolerance for non-compliance.

This statement reflects that 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 chains.

ALC operates under policies, which ensure business is conducted to the highest ethical standards, including:

- ALC Code of Business Conduct
- ALC Dignity & Respect Policy
- Supplier Code of Conduct
- Anti-Bribery & Corruption Policy
- Health, Safety & Environmental Policy

Our policies are guided and align with our Parent Company's corresponding policies.

Through its Parent Company's, ALC has an effective grievance and whistle blowing process in place to cover any concerns within the business or the supply chain.

ALC annually assesses compliance within its existing supply chain via self-declaration from key suppliers and, via Pre-Qualification Questionnaires, assesses the risks with any new significant suppliers.

Supplier Adherence to our Values

During 2019 we continued to engage with our supply chain extending communications on our Values and specifically raising awareness around the Act and reviewing the content and visibility of their Statements.

As part of this engagement, a 2019 Supplier Governance Self-Assessment Questionnaire was completed in which our key suppliers updated us on the work they were doing to manage Modern Slavery risks.

Recruitment & Training

We undertake pre-employment screening that includes identity checks and confirmation of entitlement to work in the UK, on all employees prior to commencing employment with us. On joining, each employee shall receive an induction which covers the essential policies and information in relation to policies and procedures and matters such as whistle blowing.

Each year the pay of all staff is reviewed, with a particular focus on lower-paid and part-time staff, to ensure they are being fairly remunerated for the work they do. All staff in ALC are paid at an hourly rate above the 'National Living Wage' level. Overtime work is paid and overtime levels are closely monitored to ensure they are not excessive on anyone. All staff have contracts of employment and can take paid holiday leave.

This year a 'Learning Bites' Campaign was run across the whole of the business. The purpose was to raise awareness and increase engagement in a number of key governance areas, one of which was Modern Slavery.

Further Steps

Whilst we are not aware of any non-compliance in 2019, our measures to combat Modern Slavery are under periodic review and the pro-active regime of training and adherence checks shall continue to maintain compliance.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019. The statement was reviewed by the ALC Board on 18th December 2019 and approved by them.



Hamish Knox
Managing Director

Date: 14.01.2020