

Ethical Sourcing

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CREW Boston



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MEET THE *PRESENTERS*

AGENDA

01

Why Ethical Sourcing Matters

03

Making an Impact with Implementation

02

Across the Value Chain

04

Closing

Demystify building material ethical sourcing and understand our unique role in eradicating forced labor in building supply chains.

Ethical Sourcing

Ethical sourcing in the context of construction and design is the practice of selecting, procuring, and using building materials in a way that ensures they are produced without exploitation, forced labor, child labor, or unsafe working conditions, while also promoting environmental responsibility and fair economic practices across the supply chain.

01 Transparency & Traceability

Knowing and disclosing where materials come from and how they are made to ensure ethical compliance.

02 Environmental Stewardship

Sourcing materials and services in ways that minimize harm to the planet and support decarbonization.

03 Human Rights & Labor Practices

Ensuring all workers in the supply chain are treated fairly, paid justly, and work in safe, freely chosen conditions.

This is what we are talking about today, as it is often seen as behind in the industry after Environmental Stewardship.



Why Ethical Sourcing Matters

The Scale of the Problem

28 million people live in forced labor worldwide



The disaggregation and complexity of the construction industry creates opportunity for the illegal use of forced labor to subsidize profits.

Construction is the #1 industrialized sector at risk of forced labor



Upstream risk is defined by product and location. American products are not immune.

Many of the most common materials are at the highest risk



Bricks, copper, electronics, glass, minerals, polysilicon in solar panels, precursors, rubber, steel & iron, stone, textiles, and timber.

Legal risk around the World

Modern Slavery Act 2022

Canada

U.S.

CA Supply Chain
Transparency Act 2010

Trade Facilitation and Trade
Enforcement Act 2015

The Uyghur Forced Labor
Prevention Act (UFLPA) 2022

Federal Acquisition
Regulation (FAR) 22.4

Modern Slavery Act 2015

U.K.

The Supply Chain Due Diligence Act (LkSG) 2022

Germany

France

Duty of Vigilance Law 2017

Australia

Modern Slavery Act 2018

Risk Across the AEC Industry



Across the Value Chain



Owner

Designer

Builder

DATA

**Certification
Body**

**Manufacturer
Distributor**

Consultant

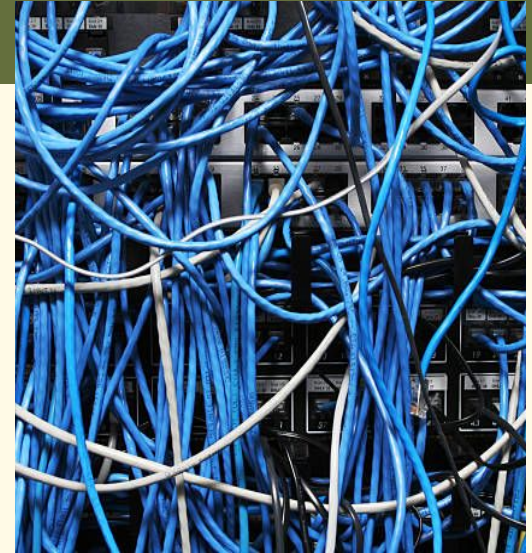
The current state of data creates even more complexity & challenge...

01 Standards are a challenge to create, and differ across owner organizations, adding to complexity.

02 Even when standards exist, **consistent implementation is impossible.**

03 Manufacturers struggle to **manage their data**

04 DPP: **Digital product passports** are only just emerging...



1a. Standard Setting, made easy!



BASIC

Baseline Level

Performance Criteria:
Restricted Substance List (RSL) screening that includes the highest concerning chemical compounds

Compliance Pathways:



No GreenScreen LT-1 Hazards



LBC Red List v3

BETTER

Above-Average Level

Performance Criteria:
Certified RSL screening that includes the highest concerning chemical compounds as well as CMRS and PBTs, or > 95% assessed and no BM-1 substances

Compliance Pathways:



C2C Certified v3 - Silver or Bronze



LBC Red List v4



Living Product Challenge w/ I.09

BEST

Highest Level or 'Market Leaders'

Performance Criteria:
Certified RSL screening with a precautionary class-based approach to avoiding priority compounds, and no CMRS and PBTs, or 100% assessed no BM-1

Compliance Pathways:



C2C Certified v3 - Platinum or Gold

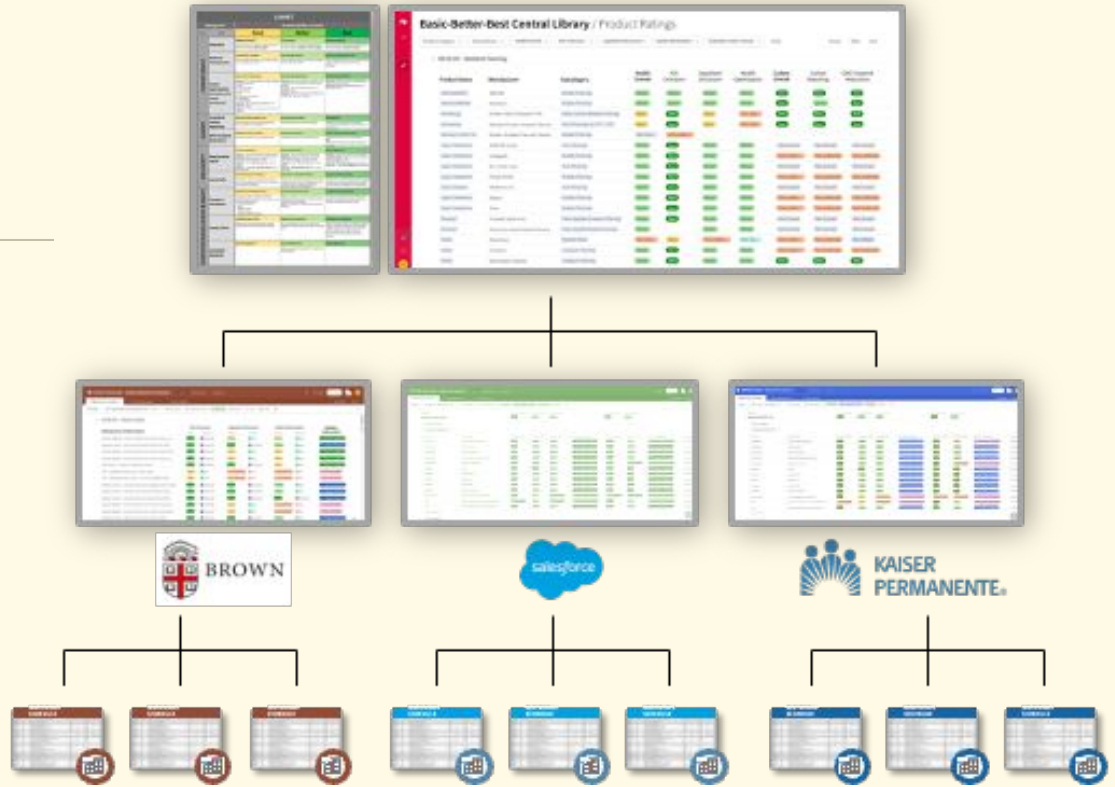


C2C Certified v4 - All Levels



Greenhealth Approved Certified - All Levels

1b. Alignment across owners!
with versatility




2. Consistent Implementation *1-click Automation*

I don't understand this stuff and I don't have time to learn....

Why should I care?



All Items				
<input type="checkbox"/>	Standards	CSI #	Product Name	Manufacturer
<input type="checkbox"/>	✓	09 65 19	SPC Tile	Welspun Flooring Limited
<input type="checkbox"/>	✗	22 62 13	Copper Medical Gas Tub...	Copper Development Ass...
<input type="checkbox"/>	✗	09 30 33	Verdi Ghazal Granite	Marmoril Marble and Gra...
<input type="checkbox"/>	✗	12 58 29	Naturpedic Breathable C...	Naturpedic Organic Matt...
<input type="checkbox"/>	✓	06 06 60	STUDIO Collection	Aristech Surfaces, LLC
<input type="checkbox"/>	✓	05 50 00	ZAM Corrosion Resistant ...	WHEELING-NIPPON ST...
<input type="checkbox"/>	✓	12 57 00
<input type="checkbox"/>	✗	09 61	 Campas 300 Kvadrat A/S 12 22 13	
<input type="checkbox"/>	✗	09 61		

Standard Violations:

Third Party Verification of Product Details has insufficient data.
Reporting Threshold Level is 100 ppm, allowed values: 10,000 ppm

General LEED LBC WELL CHPS HPD

Classification: 12 22 13 Draperies

Expiry Date: 2025-10-10

Threshold: 100 ppm

Preparer: Self-Prepared

Third Party Verified? 

Certifications and Complies:

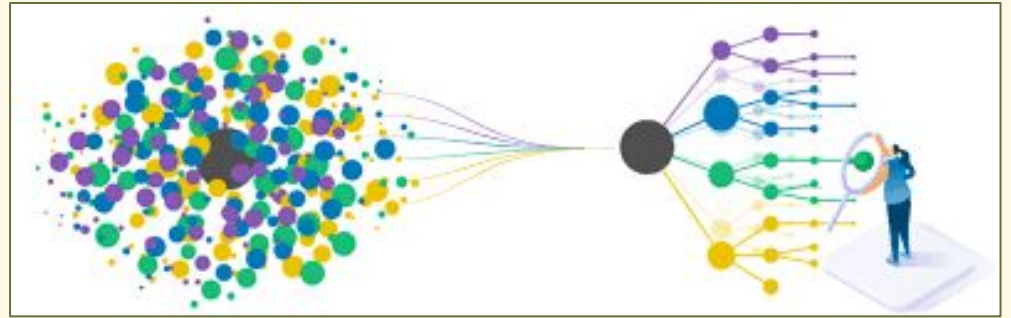
VOC emissions: ULGreenGuard Gold Certified
Multi-attribute: REACH European Union Regulation (EC) 1907/2006 concerning the Registration

LEED Program Consistency:

Pre-checked for LEED v4 Option 1
Pre-checked for LEED v4 Option 2
Pre-checked for LEED v4.1 Option 1

Now anyone knows instantly if a product meets firm or client standards!

3. Manufacturer Product Data...



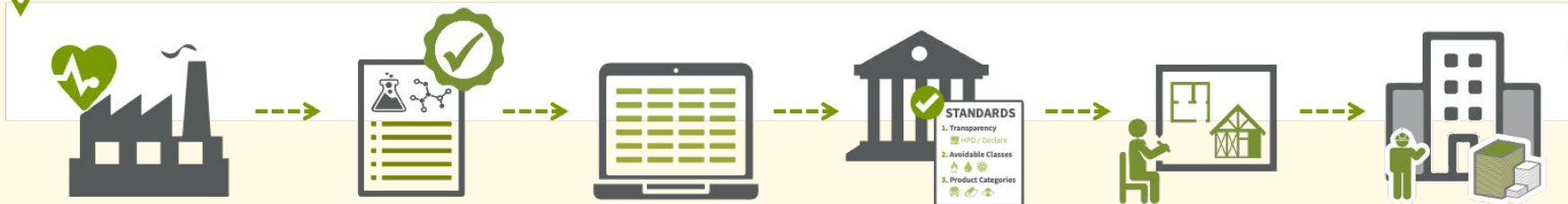
4. Digital Product Passports...



Lack of Feedback Loops Undermines Leverage & Impact

"You lost \$27m in sales this week because you don't have the [EPD, HPD, Declare, etc] required by project teams"

"**WHAT???! Where do I start?!! How fast can I get those? What do I do?**"



1. Manufacturing Sustainable Products

2. Testing & Certification

3. Readily-Available Product Data

4. Approved by Clients' Standards

5. Specified by Designers

6. Purchased by Contractors

- STANDARDS**
- 1. Transparency
HPD / Declare
 - 2. Avoidable Classes
 - 3. Product Categories

What is Design for Freedom?

A movement Designing a more just and humane future in the built environment.

A resource Accelerating and implementing strategies to remove forced labor from the global supply chain.

A working group Recognize that cheap and exploitable labor stifles innovation. Encourage industry-wide modernization through the working group.

Scan the QR code for more.



design for FREEDOM
by grace farms



...but teams are not alone with a growing number of organizations and resources

Just to name a few...

Grace Farms Design For Freedom has developed two toolkits to help implement ethical, forced labor-free sourcing strategies and created platforms across the supply chain to share lessons and build capacity.

Mindful Materials organizes and facilitates alignment across all stakeholder groups to create a Common Language (Common Material Framework/CMF) and shared criteria that enables owners, designers, builders and suppliers to be on the same page and accelerate progress.

BuildingEase is your *Easy Button!* A free technology platform connecting all in the industry, simplifying and streamlining all activities related to materials from automating standard setting and compliance through management, tracking and actual procurement of materials through a Global Buyers Club.



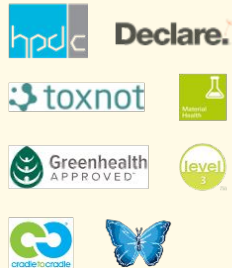
What is Mindful Materials?

A Common Language aligns all stakeholders, building rating systems, certifiers and suppliers enabling a clear market signal to accelerate positive change.



HUMAN HEALTH

- Transparency
- Optimization
- VOCs



CLIMATE HEALTH

- Embodied Carbon Reporting
- GHG Footprint Reductions



CIRCULAR ECONOMY

- Sourcing
- End-of-Life



SOCIAL HEALTH & EQUITY

- Company Workplace
- Supply Chain



ECOSYSTEM HEALTH

- Ecosystem Impacts



Lessons Learned

Creating a culture of education and ethical sourcing across the OAC team.



Making an Impact with Implementation

What do we do?

Align Standards

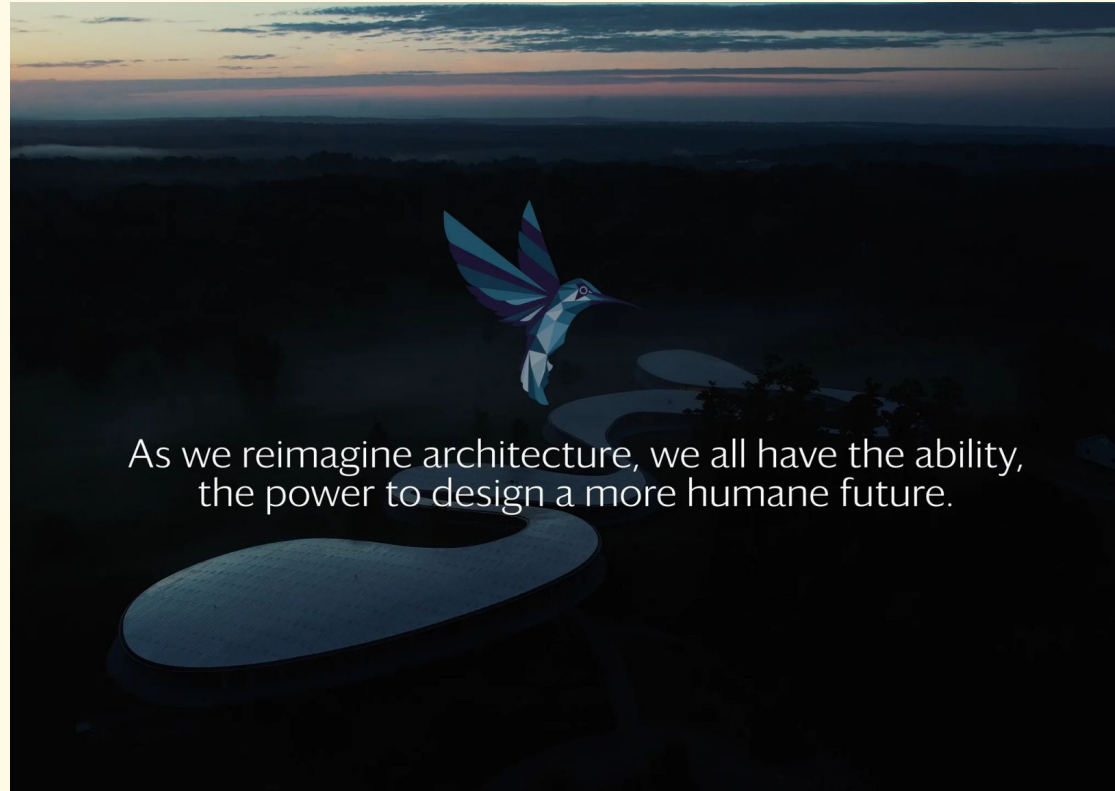
- *Speak a common language across contracts, specs, and sourcing expectations.*
- *Build shared baselines for what "ethical" means in practice.*

Collaborate Across the Chain

- *Work across disciplines; builders, designers, suppliers, and owners.*
- *Drive change through shared goals, not isolated efforts.*

Use Technology to Connect

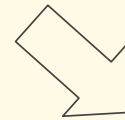
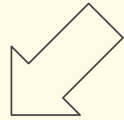
- *Digitize supplier data to see labor, carbon, and risk together.*
- *Use shared tools that make transparency measurable and scalable.*



We all have a role to play

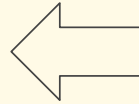
Owners

Having a Modern Slavery Policy and ethical sourcing contract language



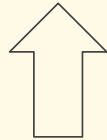
Design and Consulting

Vetting materials and integrating requirements into specifications



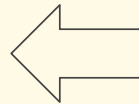
Construction

Gathering transparency documentation for approval



Supplier Manufacturing

Providing transparency documentation for design teams



Software / Data

Tracking ethical performance across complex supply chains

Now... How do we do that?

Owners

- **Read (or create!) your company's Modern Slavery Policy.**
 - Definitions
 - Applicable Laws
 - Commitments
 - Business Risk Assessment
 - Supply Chain Risk Assessment
 - Recruitment Practices
 - Raising Awareness
 - Reporting Mechanisms
 - Contract terms
 - Annual Actions Taken
- **Add ethical sourcing language to your contracts.**
 - Expectation to examine project supply chain
 - Right to review efforts to be made
 - Require consistent reporting on project implementation

Modern Slavery Statement 2024

Amazon



Now... How do we do that?

Design and Consulting

- **Read your clients Modern Slavery Policy.**
 - And the AIA Materials Pledge and AIA Code of Ethics
- **Pause to think about site and human context and connection to labor.**
 - University building research example
- **Identify high risk project materials and educate team in SD phase.**
 - Focus on high volume products (i.e. steel, timber, polysilicon)
- **Vet project materials in DD phase (and your materials library)**
 - **Gather public information:** manufacturer documents indicating commitment to ethical labor sourcing (i.e. CSR, Codes of Ethics, Human Rights, Modern Slavery Statements) and product certifications (i.e. C2C)
 - **Request non-transparent information:** send a manufacturer letter requesting information and engage suppliers in direct conversations
 - **Prioritize salvaged materials** or new products with strong third-party certifications (i.e. FSC)
- **Integrate ethical requirements into your specifications**



Adapted BWBR Forced Labor Mitigation Framework
<https://www.bwbr.com/2024/06/06/forced-labor-supply-chain-mitigation-framework/>

Example Materials Approach

Actions and Timeline



DD	Integrate on-site reuse materials into specs and drawings, identify off-site reuse processes (by end of DD)	Findings from LCA to inform specifications (finalize by end of DD)		Confirm proposed scope (Design for Freedom, procurement targets) by end of DD
CD	Deconstruction contractor engagement in DD/CD	Supplier outreach in DD/CD	Finalize specifications by end of CD CA process workshop in CD	Supplier engagement through CD
CA	Carefully coordinate Deconstruction and material reuse in CA	Update LCA by end of CD/CA	Product vetting and review during CA	MWBE contracts in CA

Example Submittal Material Reporting Form

Materials Reporting Form

(LEEDv4.1 New Construction and Design for Freedom)

Please complete this form for all permanently installed products within the Divisions noted below. Check boxes for the appropriate product type and complete all fields as indicated. Provide backup documentation for each environmental claim. See page 2 for definitions.

Submittal Number: _____	Product Name or Model #: _____	Total Material Cost (w/o site labor/equip): _____
Submittal Name: _____	Manufacturer: _____	Location of Product: Interior <input type="checkbox"/> Exterior <input type="checkbox"/>
Subcontractor: _____	Manufacturer Contact: _____	Extraction, manufacture, and purchase locations all within 100 miles? Y <input type="checkbox"/> N <input type="checkbox"/>

REQUIRED FOR ALL PRODUCTS - DIVS 3-12, 31, 32

1. MRc2 Environmental Product Declarations (EPD)

A. Does the product have one of the documents listed below?

a) EPD or Life-Cycle Analysis (LCA)? Y N

b) EPD/LCA with life cycle impact reduction action plan Y N

c) EPD/LCA showing reduction in embodied carbon (GWP) Y N

2. MRc3 Sourcing of Raw Materials

A. Does the product meet a responsible sourcing attribute below?

a) Take-back program Y N

b) Bio-based materials _____ %

c) FSC Certified Wood _____ %
- COC# _____

d) Materials reuse _____ %

e) Post-consumer recycled content _____ %

f) Pre-consumer recycled content _____ %

3. MRc4 Material Ingredients

A. Does the product disclose material ingredients to at least 0.1% (1000 ppm) via an applicable program below:

a) Manufacturer Inventory? Y N

b) Health Product Declaration? Y N

c) Cradle to Cradle Material Health Certificate? Y N

d) Cradle to Cradle Certified Y N

e) Declare Label? Y N

f) ANSI/BIFMA e3 Furniture Sustainability? Y N

g) Product Lens Certification? Y N

h) Facts - NSF/ANSI 336 Assessment? Y N

B. Action plan to mitigate and reduce known hazards associated with this product's ingredients? Y N

REQUIRED FOR INTERIOR PRODUCTS - ALL DIVS

4. EQc2 Low-Emitting Materials

A. Select the applicable product type (choose one):

Adhesive or Sealant Insulation (w/CAJ/summing excluded)

Paint or Coating Furniture Product

Flooring Composite Wood (non-structural)

Wall Panel Composite Wood (structural)

Ceiling None of the Above

B. Is product inherently non-emitting? Y N

C. Is product salvaged/reused? Y N

D. Complete for interior adhesives, sealants, paints, & coatings:

a) VOC Product Type: _____

b) Provide VOC content (grams/liter) _____ g/L

c) Estimated installed volume (liters) _____ L

d) VOC Emissions Evaluation* available? Y N

e) Added Methylene Chloride or Perchloroethylene? Y N

E. Complete for interior flooring, wall panels, ceilings, & insulation:

a) VOC Emissions Evaluation* available? Y N

F. Complete for composite wood products:

a) Ultra-Low-Emitting Formaldehyde resins? Y N

b) No Added Formaldehyde resins? Y N

c) Tested per EN 717-1:2014 / complies with E1? Y N

d) Moisture resistant adhesive meets ASTM 2559? Y N

G. Complete for furniture products:

a) Furniture Emissions Evaluation* available? Y N

REQUIRED FOR ALL PRODUCTS - DIVS 3-6, 9, 12, 31, 32

5. Design for Freedom Materials

A. Has the Design for Freedom Supplier Questionnaire been completed and included in the submittal documentation for this material/product? Y N

B. If available, are the organizational or product specific certifications included in the submittal documentation for this material/product? Y N

FOR REVIEWER TO COMPLETE / INTERNAL USE

1. Exceptions taken to product? Y N

2. Resubmission needed with additional info? Y N

3. EPD/LCA Type? LCA Industry-wide Type III EPD (ext.) Product-specific Type III EPD (ext.) No EPD

4. Mnfr Inventory Type? CASRN or EC Number GreenScreen LT Full GreenScreen BM GHS 2015 No Mnfr Inventory

5. Declare Label Type? Red List Free Declared LBC Compliant N/A

6. Cradle to Cradle version and level? _____

7. MRc4 Option 2 Adv. Inventory/Assessment? Y N

8. TVOC Range (if applicable): <0.5 mg/m³ 0.5-5.0 mg/m³ >5.0 mg/m³

9. Notes: _____

Contractor Certification:

I, _____ a duly authorized representative of _____ hereby certify that the material information contained herein is an accurate representation of the material qualifications to be provided by us, as components of the final building construction. Furthermore, I understand that any change in such qualification during the purchasing period will require prior written approval from the Construction Manager and Owner.

Signature of Authorized Representative _____ Date: _____

* See the USGBC Low-Emitting Materials Third Party Certification table for acceptable 3rd party certifications and programs: <https://www.usgbc.org/resources/low-emitting-materials-third-party-certification-table>

LEED v5 Building Product Selection and Procurement Credit

Social Health & Equity	
Summary of the Criteria Area	<p>The Social Health & Equity criteria area rewards the selection of products from manufacturers that uphold human rights throughout the supply chain, therefore striving to protect workers and communities impacted by material extraction and production. This criteria area aims to harmonize the efforts for Social Health & Equity product excellence with sources such as the Mindful Materials Common Materials Framework, the Grace Farms Design for Freedom guidance, and Cradle to Cradle Product Standards.</p>
Level 1	<p>Level 1 Overview: Products in this criteria area verify supply chain worker protections in addition to assessing human rights abuse hotspots in the supply chain and mitigate risk.</p> <p>Level 1 Criteria: Assessment and identification of human rights risks within the supply chain are completed by an approved third party. The assessment is completed for Tier 1 suppliers with any identified corrective actions taken, and steps toward greater assessment are in place for Tier 2 suppliers and beyond.</p> <p>Qualifying Product Documentation – Value at 1x:</p> <ul style="list-style-type: none"> Cradle to Cradle: <ul style="list-style-type: none"> Product is Cradle to Cradle Certified (v4 or later) at the Bronze or Silver level, or the product achieves a Social Fairness score at the Bronze or Silver level. <p><i>Additional criteria for this Level are currently under development and may be added in future LEED addenda.</i></p>
Level 2	Currently Under Development
Level 3	Currently Under Development

Level 1 = Basic

→ Level 1

Level 2 = Better

→ Level 2

Level 3 = Best

→ Level 3

Now... How do we do that?

Construction

- **Prequalification**
 - Integrate ESG and human rights criteria into supplier and subcontractor prequalification and onboarding, assessing labor practices, transparency, and environmental performance before award for due diligence in the procurement process
 - Ask suppliers to provide Supplier Codes of Conduct and Certifications for all tiers in their supply chain
- **Research and Verify**
 - Conduct or reference ethical and healthy materials research to identify risks in materials commonly used in construction.
- **Track and Trace**
 - Perform sourcing tracking or tracing for 2–5 high-risk materials to confirm responsible origin and labor practices.

	Ethical Sourcing			
	Good	Better	Best	Innovative Leadership
Service	Ensure that all policies are completed. • Supplier Compliance: ensure all contractors signing our Supplier Code of Conduct. • Supplier Diversity: Track inclusion of all UBE subcontractors. • Sustainability: Track and report materials as required for and/or certification standards.	Include all Policies and also provide additional ethical or healthy research, transparency tracking; • Ethical and or Healthy Materials research or analysis for specific materials • Perform sourcing tracking or tracing of 2-5 typical high risk materials	Include all Policies and also provide additional ethical or healthy research, transparency tracking; • Ethical and or Healthy Materials research or analysis for the whole project • Perform sources tracking or tracing of 5+ typical high risk materials	Pilot Project researching a new material or software to better understand the construction supply chain. Pilot could also include submitting as a Design for Freedom Pilot Project.
Deliverable to Client	NA	• Final materials spreadsheet (similar to LEED Material Tracking Log) • Final materials report	• Final materials spreadsheet (similar to LEED Material Tracking Log) • Final materials report	Final report discussing pilot, results, and lessons learned.
Estimated GC Costs/Hours	Included already in other efforts	• Preconstruction (or HQ) - 2-4 hours per month • Operations - 4-7 hours per month	• Preconstruction (or HQ) - 4-6 hours per month • Operations - 8-12 hours per month	• Preconstruction - TBD; highly dependent on pilot selected. • Operations - TBD; highly dependent on pilot selected.

Transparency Documentation Research/Analysis

Gathering transparency documentation in construction administration phase

- Ethical research or analysis for specific materials
 - Numerous tools and software to start with!
Check out the [DFF toolkit](#) for more
- Perform sourcing tracking or tracing of 2-5 typical high risk materials

Burma	Beans (green, soy, yellow) There are reports that children ages 15-17 work under conditions of forced labor in the production of beans in Burma. An NGO study documents children, as well as adults, forced by the military to work on rotation year round, planting and harvesting beans for the military camp. Local officials and the military enforce these work orders; the children cannot refuse to work, even if sick.	Child Labor, Forced Labor
Brazil	Beef	Child Labor
Bangladesh	Bidis (hand-rolled cigarettes)	Child Labor
India	Bidis (hand-rolled cigarettes)	Child Labor
Malaysia	Biofuel ILAB has reason to believe that multiple palm oil products produced in Malaysia are produced with an input derived from child labor and forced labor, specifically palm fruit produced in Malaysia. These palm oil products include crude palm oil, crude palm kernel oil, refined palm oil, refined palm kernel oil, cooking oil (palm oil blends), oleochemicals, and biofuel. Palm fruit from Malaysia was added to ILAB's List of Goods Produced by Child Labor or Forced Labor in 2009 for forced labor and added in 2014 for child labor. Research from NGOs and media reports continue to show tens of thousands of children work in the palm fruit sector in Malaysia. Similar reporting shows forced labor indicators are widespread in palm fruit plantations, particularly among migrant workers who face vulnerabilities during and after recruitment. This research suggests that further worldwide downstream products of palm fruit and palm oil, such as animal feed, baked goods, beverages, household and industrial products, personal care products, cosmetic products, infant formula, and shortening, may be produced with an input produced with child labor and forced labor.	Inputs Produced with Child Labor, Inputs Produced with Forced Labor
Cambodia	Bovines There is evidence that children between the ages of 5 and 14 engage in the production of bovines in Cambodia. In Cambodia, bovines are primarily used for domestic consumption and for farming purposes, and are raised by approximately 1.4 million smallholders primarily located in provinces bordering the Mekong River, with a heavy concentration found in the southern rice-producing provinces. Based on analysis of the 2016 Cambodian Socio-Economic Survey, an estimated 59,693 children are involved in child labor in the production of bovines. The release of this survey demonstrates the Government of Cambodia's commitment to addressing child labor and its acknowledgment that data collection is vital to the design and implementation of sound policies and programs.	Child Labor
Ecuador	Bovines	Child Labor

US Dept of Labor List of Goods Produced by Child Labor or Forced Labor
<https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>

Now... How do we do that?

Supplier Manufacturing

- **Transparency:** Provide clear, accessible documentation on sourcing, labor practices, and product origins to support client due diligence.
- **Human Rights Policy:** Publish a company-wide policy aligned with UN and ILO standards, outlining commitments to fair labor, safe conditions, and non-discrimination.
- **Supply Chain Mapping:** Identify key suppliers and material origins across tiers, and disclose known risks related to geography or labor practices.
- **Human Rights Management Program:** Establish systems for supplier vetting, training, grievance reporting, and corrective action when violations occur.
- **Third-Party Labor Audits:** Conduct recognized audits (e.g., **SMETA**) and share results and improvement actions transparently with partners.



International
Labour
Organization

Human Rights Policy

- **Qualify for more projects:** Many clients now require it during prequalification.
- **Build client trust:** Shows transparency and accountability in labor practices.
- **Reduce risk:** Helps prevent labor violations and supply chain disruptions.
- **Stay compliant:** Meets evolving global regulations on ethical sourcing.
- **Strengthen partnerships:** Aligns with clients' ESG values and long-term goals.



NUCOR CORPORATI HUMAN RIGHTS POLI

Nucor Corporation ("Nucor") is North America's largest steel products company, with over 300 facilities primarily in Canada and Mexico. Nucor is North America's largest Human Rights Policy (the "Policy") articulates Nucor's rights consistent with the core principles of the U.N. G. Human Rights. This Policy focuses on the areas that Nucor and the steel and steel products industry.

PURPOSE

This Policy sets out the principles for Nucor's actions rights. This Policy and Nucor's continued practices a environment in which human rights are recognize company and our supply chain. Adherence to this Po engage in activities that directly or indirectly violate hu

SCOPE

This Policy applies to all of our employees ("Teamw In addition, contractors and subcontractors of all tier expected to comply with this Policy. We promote the Policy's principles to our contractors, subcontractors and suppliers of every tier, and engage with customers and joint venture partners regarding the same.

The Policy complements and brings together the human rights aspects from other Nucor policies and guidelines, which include Nucor's Supplier Code of Conduct, Combating Trafficking in Persons; Eliminating Forced Labor; Health and Safety; Standards of Business Conduct and Ethics; Code of Ethics for Senior Financial Professionals; Policy on Affirmative Action; Equal Employment Opportunity; and Discrimination and Harassment policies and related guidelines. In implementing this Policy, Nucor's facilities are subject to the laws of the jurisdictions in which we operate, and we are committed to complying with all such applicable laws.

In the event Nucor's Policy, procedures and external commitments are more stringent than local laws, we operate in accordance with Nucor's higher standards. In situations where local law is less stringent than generally recognized international human rights



Slavery and human trafficking policy statement

This policy statement sets out the approach Mace Group and its subsidiaries ("Mace") have taken to date and those Mace intends to take over the 2021 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 sign upon this statement, where necessary, for the purpose of complying with that individual annual reporting requirements of the Modern Slavery Act 2015. This approach and processes related to within the statement are relevant to all Group companies and Mace will continue to monitor and engage 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, construction delivery and facilities management services. Mace works from the strategic hubs in Europe, Middle East and North Africa, the Americas, Asia Pacific and Sub-Saharan Africa. Our global supply chain comprises contractors, service providers, producers of materials and manufacturers of a variety of mechanical, electrical and other 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 to upholding high ethical standards in all of our operations, including those provided by our supply chains around the world.

Mace operates across a range of business sectors and activities, and our approach to pro-actively addressing the risks of modern slavery reflects local context and the services Mace offers. Our four principal areas of business operations are as follows:

- **Design** – responsible for procuring and managing a diverse supply chain including professional teams, contractors and operators.
- **Contract** including Mace Interiors, Mace MEP, Mace Logistics and Mace Tech – responsible for managing contractors and suppliers (materials and labour) in the supply chain and the on-site workforce.
- **Consult** – responsible for project management and working with clients, overseeing design and procurement teams and managing client requirements and specializations.
- **Operate** – responsible for facilities management staff and employed to procure and/or supervise suppliers on behalf of our clients.

Our direct responsibilities under the Act cover Design, Contract and Operate. In Consult the responsibilities lie primarily with our clients and their directly contracted delivery partners.

Our primary risk area is within the highly fixed supply chain structure leading to construction delivery. Therefore, achieving transparency of labour employment arrangements and sourcing of materials are key challenges.

The Mace Group Chief Executive, Mark Reynolds, in the Executive Board member responsible for overseeing the Mace approach to eradicating modern slavery from business operations. The Responsible Business (RB) team, procurement team, legal team and human resources team each support implementation of the Mace approach to leading 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 iStock, as well as charities such as Hope for Justice (Bible free alcohol) and Basix, to help implement our approach.

Mace policies in relation to slavery and human trafficking

Mace has made a number of commitments and developed policies designed to help us eradicate modern slavery. These include:

- Management systems ISO26001:2015, ISO45001:2015 and OHSAS18001:2007, which include procedures and guidance documents outlined below
- External facing Slavery and Human Trafficking Policy Statement Part MGS-EM-PL-000
- Internal facing policy file MGS-EM-PL-002
- Mace Responsible Business Strategy 2020
- MGS-EM-QD-077 Modern Slavery – Guidance on Supervision referenced in AG0280
- MGS-EM-QD-016 Modern Slavery – Guidance on Procurement referenced in MGS-EM-PL-040/AG02815
- Master Subcontract Areas MFP-FC-PM-006 – covering minimum contract requirements leading modern slavery
- AG0215 – Sustainability Management Activity Instruction
- Responsible Business: Construction Delivery Procurement & Guidance – MGS-EM-PL-040
- Mace Speak Up whistleblowing reporting service and supporting procedures
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Take one step

And remember we are in this together. The movement requires all of us. Reach out to a friend!



Closing

“You cannot get through a single day without having an impact on the world around you. What you do makes a difference, and you have to decide what kind of difference you want to make.”

— Jane Goodall

Thank you



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Reach out