

# Slavery and Human Trafficking Statement

August 2020

## 1. Purpose

This statement (the **Statement**) is made on behalf of Bouygues E&S Solutions Limited and all its affiliated companies in the United Kingdom which include Bouygues E&S Contracting UK Limited and Bouygues E&S Infrastructure UK Limited (together, "**BYES**") pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**).

BYES takes its obligations in relation to the identification, prevention and reporting of modern slavery and human trafficking very seriously. It is working hard to identify and reduce the risk of modern slavery or human trafficking in its supply chains or in any part of its business and aims to have a zero tolerance approach to managing the risk of modern slavery. Its anti-slavery policy reflects its commitment to acting ethically and with integrity in all its business relationships. BYES adheres to a worldwide group Code of Ethics personally supported by Martin Bouygues, Chairman and CEO of Bouygues SA, and pursuant to this undertakes to comply with the strictest legal and moral standards in the conduct of its operations.

The Statement sets out what BYES has done in the financial year ending **31 December 2019** to work towards ensuring that slavery and human trafficking is not taking place in any part of its businesses or supply chains. Its publication has been slightly delayed due to pressures of resourcing following the outbreak of the COVID-19 pandemic.

## 2. BYES' structure, business and supply chain

BYES' activities in the UK include facilities management, design & build, energy performance contracting, infrastructure design and build, maintenance and related activities in the UK and Ireland to both public and private sector clients. It has around 3000 direct employees in the UK. BYES is part of a group of companies worldwide which have Bouygues SA, a CAC 40 company listed on the Paris Euronext, as their ultimate parent. The Bouygues group has around 115,000 employees worldwide and operates in nearly 90 countries.

As a leading services provider, BYES has a complex supply chain model that both supports its core businesses and maintains its office and technology infrastructure. BYES' supply chains relate mainly to the following activities:

- **Labour Supply** – the supply of permanent and temporary labour for service contracts;
- **Subcontracting** – the specialist contractors necessary to deliver certain construction, engineering and service operations on construction and operational sites;
- **Consultancy** - professional and consultancy services from design professionals in various fields, including, without limitation, engineering (such as architectural, mechanical and electrical services and process engineering) street lighting, landscape design, sustainability, energy management, project management, cost consultancy and surveying;
- **Business services** – a wide range of products and services necessary to maintain normal day to day operations in its own offices, those of its clients for which it carries out facilities management services and to support its core business functions such as cleaning, catering, security, IT support and print services;
- **Professional services** – professional services such as external training, audit services and advisory

services in areas such as tax, regulation, insurance and law.

- **Real estate** – the purchase or leasing of office space to accommodate staff and operate its business;
- **Technology** – the systems, software and equipment that are necessary to maintain the technology infrastructure that supports BYES' core business; and
- **Travel** – mobility is essential and BYES works with a service provider which manages its transportation and accommodation bookings.

### 3. Policies in relation to modern slavery and human trafficking

BYES has a number of policies and procedures which are relevant to preventing instances of modern slavery from occurring in its business or its supply chains, including having a dedicated compliance team to whom breaches of any of the following policies can be notified. In particular, the following policies are directly relevant to the subject matter of this Statement:

- **Code of Ethics** – this requires employees to comply with the principles of the United Nations Universal Declarations of Human Rights, the fundamental conventions of the International Labour Organisation, in particular, concerning forced child labour and the principles of the United Nations Global Compact;
- **Responsible and Committed** – this is a charter aiming to ensure we fully respect our clients and collaborators, the environment and all our stakeholders and that through our actions we help to meet major societal challenges. The aims are supported by 12 commitments which include a pledge of ethical behaviour and a guarantee of respect for fundamental human rights throughout the BYES group's operations.
- **Health & Safety policy** – this policy sets out BYES' commitment and approach to ensuring it provides a healthy, safe working environment for its own staff and contractors that work on-site;
- **Harassment & Bullying policy** – this policy sets out BYES' approach to preventing the occurrence of discrimination, harassment, bullying or victimisation in the work place;
- **Authority limits and contract signing policy** – this policy sets out BYES' internal control and governance procedures with regard to approving financial transactions and signing contracts with suppliers. The policy ensure that contracts cannot be entered into without an appropriate level of review and authorisation by a suitably senior and qualified member of staff;
- **Whistleblowing policy** – BYES has a clear policy encouraging all its employees and supply chain to report any concerns and bad practice they become aware of to the attention of senior management , without fear of repercussions for doing so;
- **Anti-slavery policy** – this policy specifically addresses the subject matter of the Act recognising and preventing trafficked, forced, bonded and child labour; and
- **Corporate Social Responsibility Suppliers Charter (the "Charter")** - the Charter is a contractual requirement, setting out the obligations for BYES suppliers to cascade the same obligations to their own suppliers. Suppliers are required to provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. They are expressly forbidden from using forced or compulsory labour as well as engaging in child labour. BYES works with suppliers to ensure that they meet the standards of the Charter. Serious violations of the Charter will lead to the termination of the business relationship.

### 4. Due diligence processes

BYES and its suppliers are expected to live up to and adhere to the principles set out in the anti-slavery policy and demonstrate progress towards the standards set out in it.



BYES' procurement practices require that all new suppliers are subject to an appropriate level of screening. The scope of the screening BYES performs depends on the nature of the goods or services being procured but can include financial checks, data security assessments, reference checks, obtaining copies of relevant documents, certifications and/or site inspections.

BYES' on boarding platform allows further detailed checks of our supply chain including, but not limited to, assessments regarding Modern Slavery. This may include:

- identifying the modern slavery and human trafficking risks in high or medium risk sectors or territories;
- reviewing aspects of the supply chain based on supply chain mapping;
- conducting supply chain audits or assessments, which include a focus on slavery and human trafficking where high risks are identified;
- taking steps to promote best practice, including providing advice through supply chain events and via third party auditors, as a partner of the Supply Chain Sustainability School. BYES has invited all of its priority suppliers, for free, to become members and to have access to all the online resources and training events proposed by the Supply Chain Sustainability School;
- participating as a registered Business Partner in the "Stronger Together" campaign against modern slavery and human trafficking (<http://stronger2gether.org>);
- invoking contractual sanctions against supply chain partners that fail to improve their performance or seriously violate our Charter, including the termination of the business relationship.

BYES intends to further progress its modern slavery gap analysis and expand the risk profiling of its supply chain enabling us to detect and address any potential labour exploitation and human trafficking that may exist.

## **5. Risk assessment and management**

Overall responsibility for the BYES' anti-slavery initiatives is held by the board and its directors. The board has delegated oversight and monitoring of corporate social responsibility and ethical matters to a sub-committee (the "**Ethics Committee**") composed of the Director of Human Resources, the Director of Legal and the Director of Procurement. The Ethics Committee has the power to make recommendations to the board for the introduction or amendment of policies and practices to ensure the BYES' activities display the high expectations of ethical conduct.

Section 2 above sets out areas of BYES' business activities where there could be a higher risk of slavery or human trafficking taking place.

BYES has a central procurement function that assesses and manages the procurement of high value and/or high risk goods and services in accordance with BYES' procurement practices and formal tendering procedures. This function has received specific awareness training on the issue of Modern Slavery to support in this risk assessment and management, particularly of subcontractors. It is our intention to develop our heat mapping exercise to provide further clarity on high risk members of our supply chain.

BYES also employs a team of lawyers to ensure compliance with its legal and ethical obligations.

BYES provides its employees with access to an employee assistance programme (provided by an independent third party company) that can be used by its employees for free and confidential advice in relation to workplace concerns or issues. It also has in place appropriate processes for reporting concerns with the business, including a whistleblowing policy and a designated Ethics Committee. BYES has reminded all staff to be vigilant in our workplaces in respect of potential labour exploitation and to report anything giving rise to a suspicion in this area.



BYES includes model clauses on the Act in all of its contracts with suppliers, subcontractors and consultants requiring compliance with the Act and with BYES' Modern Slavery policy, requiring suitable due diligence of the continuing supply chain and the corresponding contractual terms and permitting termination of the supplier/subcontractor/consultant for breach. It continues to ask its supply chain to voluntarily comply with its clauses on the Act for contracts which have already been signed.

BYES also requires our supply chain to comply with the terms of our Corporate Social Responsibility Suppliers Charter. By adopting this Charter, our supply chain undertakes to act in accordance with and implement all the principles it contains (including modern slavery) and to ensure that its own suppliers do likewise.

## **6. Evaluating BYES' effectiveness**

BYES recognises that some areas of BYES in the UK are exposed to parts of the industry that could be considered high risk and is committed to undertaking further developed due diligence of its supply chain over the coming year. The business remains committed to developing its policies and processes to ensure that any occasion of modern slavery or human trafficking is identified and resolved in the best interests of the victim.

We intend to continue our programme of awareness to employees and our supply chain, further progress our detailed risk mapping of the business and its supply chains and further develop our procurement auditing of the highest risk supply chain members.

## **7. Training in relation to slavery and human trafficking**

BYES has:

- Trained 77% of BYES employees (including all new starters) via (as at the end of this financial year) highlighting how to spot the signs, how to report and BYES' policy on modern slavery;
- Continued to develop a toolkit of materials and supporting communications for use on our sites to raise awareness of modern slavery, how to report, immediate action to take and BYES' policy on modern slavery. The materials include posters in multiple languages urging anyone who is affected by these issues or who has a suspicion that modern slavery may be occurring on one of our sites to contact their line manager, BYES' dedicated modern slavery reporting mailbox or the relevant authorities so that the matter can be addressed;
- A training session was organised for high risk supply chain on how to spot modern slavery and what best practice could be implemented within their organisations. Further training will be organised with the support of Sustainability Supply Chain School.

## **8. Conclusion**

This Statement was approved by the Boards of Bouygues E&S Solutions Limited and Bouygues E&S Infrastructure UK Limited on 2<sup>nd</sup> October 2020 and by the Board of Bouygues E&S Contracting UK Limited on 21<sup>st</sup> October 2020. It was reviewed and approved by each of the individual subsidiaries and affiliated entities of BYES which has obligations under the Act.



A handwritten signature in black ink, appearing to read "David Carr". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

**David Carr**  
**Chief Executive Officer**  
**Bouygues E&S Solutions**  
**Limited and Bouygues E&S**  
**Infrastructure UK Limited**

A handwritten signature in blue ink, appearing to read "Steven Weir". The signature is written in a clear, cursive style.

**Steven Weir**  
**Managing Director of Bouygues E&S**  
**Contracting UK Limited**