

Slavery and Human Trafficking Statement

June 2021

1. Purpose

This statement (the **Statement**) is made on behalf of Bouygues E&S Contracting UK Limited ("**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 2020** to work towards ensuring that slavery and human trafficking is not taking place in any part of its businesses or supply chains.

2. BYES' structure, business and supply chain

BYES' activities in the UK include engineering, construction, servicing and maintenance of highly technical facilities in critical and controlled environments. BYES also undertakes substantial turnkey projects for pharmaceutical clean and sterile facilities, laboratories and process installations, printing press halls and data centres as well as energy from waste plants for both public and private sector clients. Some examples of its UK projects are VIRTUS Data Centre LON 5, LON 6, LON 7, Belfast ATT, Hoddesdon ATT, Teruma Vascutek and VALNEVA OB 1&2. In the UK, it has around 275 permanent employees and 30 employees employed on a contract basis or via a recruitment agency. 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 129,000 employees worldwide and operates in nearly 80 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 that BYES fully respects its clients and collaborators, the environment and all its stakeholders and that through its actions, BYES helps 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. This policy also applies to third parties such as consultants, contractors, trainees, casual and agency staff;
- **Responsible Procurement policy** - this policy was launched in 2020 and mandates all members of staff who are directly and indirectly involved in the procurement of goods and/or services to source the best products and services at the best overall value via ethical means and recognised standards. It also mandates these employees to make responsible purchases by ensuring that they develop the local economy, reduce environmental impact, manage the financial health of the supply chain, work with the supply chain to ensure proper labour standards in an attempt to eliminate modern slavery practices as well as health, safety and wellbeing of its members.
- **Anti-slavery and Human Trafficking 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.

These policies are available on BYES' Internal Management System and/or emailed to its employees.

In October 2020, BYES launched a new 'Speak Up' campaign which introduced an independent partner providing a telephone hotline and an online platform for employees to confidentially and anonymously report incidences of harassment and bullying. This ensures that those at risk and who may not have access to email or other methods of reporting will still be able to report any concerns on a timely basis.

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 its 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;
- invoking contractual sanctions against supply chain partners that fail to improve their performance or seriously violate the BYES Charter, including the termination of the business relationship.

During 2020, BYES entered into framework agreements with 6 labour agencies, meaning that recruitment of temporary labour will be focused through these agencies. Pursuant to their contractual obligations, the labour agencies are required to conduct all the applicable 'right to work' checks and ensure that all legislation applicable to the workers are complied with. The labour agencies are also required to comply with BYES' Modern Slavery policy. The framework agreement authorises BYES to conduct audits to ensure among other things, that the labour agencies are conducting all the applicable screenings to ensure that the workers they provide are not victims of modern slavery.

5. Risk assessment and management

Overall responsibility for the BYES' anti-slavery initiatives is held by the board and its directors.

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

To further its management of modern slavery risk, in 2020 BYES engaged an external consultant to assist

with a full risk assessment and heat mapping of its supply chain. The key modern slavery risks in BYES supply chains were identified. A gap analysis against the existing BYES policies, procedures and activities was conducted enabling BYES to identify the key gaps in its policies, strategies, organisational capability and supply chain processes and engagement. This has now put the business in a better position to be able to detect and address any potential labour exploitation and human trafficking that may exist and enabled BYES to develop a forward- looking strategy prioritising areas of focus in the coming years.

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. The heat mapping exercise provided further clarity on high risk members of the BYES supply chain and enabled the business to develop and prioritise its future actions.

BYES also employs a team of lawyers to ensure compliance with its legal and ethical obligations. In addition, BYES is part of a Modern Slavery Working Group with senior members of key business operations, across the Group's entities in the UK, tasked with identification of areas of improvement of current methods of tackling modern slavery, assisting in the risk management of the BYES supply chain and in the implementation of strategies and reporting.

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. BYES has reminded all staff to be vigilant in its 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 its supply chain to comply with the terms of the BYES Corporate Social Responsibility Suppliers Charter. By adopting this Charter, its 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.

Any potential concerns about incidents of Modern Slavery on BYES sites have been investigated internally and, where appropriate, reported to the Modern Slavery Helpline, the Gangmasters and Labour Abuse Authority and/or local police. Appropriate risk assessments have then been undertaken specific to the relevant concern. To the best of BYES knowledge, no cases have been confirmed by the authorities.

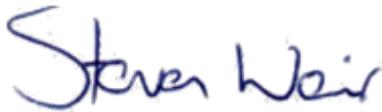
7. Training in relation to slavery and human trafficking

In 2020, BYES:

- Trained all its new starters via its online training module highlighting how to spot the signs, how to report and BYES' policy on modern slavery;
- Developed and issued a toolkit of materials and supporting communications for use on BYES 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 its sites to contact their line manager, BYES' dedicated modern slavery reporting mailbox, its hotline and online platform or the relevant authorities so that the matter can be addressed;
- In partnership with the Supply Chain Sustainability School, celebrated Anti-slavery Day on 19th October by hosting an interactive quiz for all staff to raise their awareness of modern slavery.

8. Conclusion

This Statement was approved by the Board of Bouygues E&S Contracting UK Limited on 29 June 2021. It was reviewed and approved by each of the individual subsidiaries and affiliated entities of BYES which has obligations under the Act.



Steven Weir
CEO of Bouygues E&S Contracting UK Limited