

Slavery and Human Trafficking Statement

1 January 2021 to 31 January 2021

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 Infrastructure UK Limited (together, "**BYES**") pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**). The Act makes provision about slavery, servitude and forced or compulsory labour and requires BYES to make an annual statement setting out the steps taken to ensure there is no slavery within its business or supply chain.

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. 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 2021** to work towards the prevention of slavery and human trafficking in its businesses or supply chains.

2. BYES' structure, business and supply chain

BYES' activities include facilities management, design & build, energy performance contracting, infrastructure design and build, maintenance and related activities in the United Kingdom to both public and private sector clients. It has around 2370 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 its ultimate parent. The Bouygues group has around 125,600 employees worldwide and operates in 81 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 and projects
- **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) 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.
- **Purchasing of Goods & Materials** – BYES sometimes purchases goods and materials to support delivery of its services as well as on behalf of its clients.

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 CSR charter aiming to ensure BYES fully respects its clients and employees, 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 & Wellbeing policy** – this policy sets out BYES’ commitment and approach to ensuring it provides a healthy, safe working environment for its own staff and supply chain partners 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 workplace. This is supported by an independently hosted ‘Speak Up’ hotline which is discussed below;
- **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 ensures 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 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 consultants, contractors, trainees, casual and agency staff;
- **Responsible Procurement policy** – this policy 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' supply chain to cascade the same obligations to their own supply chain. BYES' supply chain is 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 its supply chain to ensure that they meet the standards of the Charter. Serious violations of the Charter may lead to the termination of the business relationship in the event that a supplier is not willing or able to work with BYES to improve its mitigations against the risks of modern slavery occurring in their supply chain, including provision of training.

These policies are available on BYES' Internal Management System and/or emailed to employees or otherwise made available to the supply chain during the procurement process.

The BYES 'Speak Up' campaign continues to be run by an independent partner providing a telephone hotline as well as an online platform for employees to confidentially and anonymously (at their option) report incidences of harassment and bullying or for the supply chain to report incidences of suspected modern slavery. This ensures that those at risk and who may not have immediate access to email will still be able to report any concerns on a timely basis.

4. Due diligence processes

BYES and its supply chain 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 members of its supply chain 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 offices 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 supply chain members, 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 potential termination of the business relationship.

Recruitment of labour is focused through a limited number of labour agencies with whom BYES has framework agreements. 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.

Following the good practice started in 2020, BYES has continued to make additional contact with the key members of its supply chain to ascertain and understand the challenges faced by them due to the COVID-19 pandemic to ensure the flow of payments continued to be on time and not adversely affect their supply chain.

Further, BYES' site teams hold regular meetings with its subcontractors and consultants during which labour standards, health and safety, payment and performance issues are discussed. BYES' staff also conduct regular performance assessments of its supply chain which involve scoring them on the BYES internal platform using several criteria including environment, quality, resources, safety and sub-supply chain. Intrinsically this includes the well-being of their staff. This allows BYES to continuously monitor the performance of its supply chain and act promptly when their performance falls below the required standards. The scores are considered in BYES' decision to engage these supply chain partners in future projects. BYES' Business Review meetings with members of its key supply chain is another way in which their performance is assessed and these meetings also review their compliance with BYES' contractual requirements such as the Charter, Modern Slavery and Health and Safety policies.

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 Finance, 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.

BYES also has a separate Corporate Risk Committee. This committee has senior representation from the Legal, Information Security, Sustainability, Business Improvement, Human Resources, Financial, Health & Safety and Operational Departments. The committee reviews emerging and existing risks. Any escalating risks are then reviewed by the Board. Such risks would include any significant risks highlighted as a result of supply chain due diligence.

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

2021 has seen the implementation of 2020's risk assessment and heat mapping of modern slavery risks in BYES' supply chain. Together with 2020's gap analysis against BYES' existing policies, procedures and activities, this enabled BYES to be better able to detect and address any potential labour exploitation and human trafficking, identifying which supply chain sectors were most at risk of containing modern slavery. As a result of this risk based due diligence approach, BYES carried out a number of targeted audits in 2021, using the results to assist selection of a suitable supply chain partner.

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 renewed its specific awareness training on the issue of Modern Slavery to support in this risk assessment and management, particularly of subcontractors. The heat mapping exercise has provided further clarity on high-risk members of the BYES supply chain and enables it 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. BYES also has in place appropriate processes for reporting concerns with the business, including a whistleblowing policy and a designated Ethics Committee.

BYES includes model clauses on the Act in all of its contracts with its 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, the BYES 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 considers that it is a responsible employer and main contractor and that it has effective processes in place for management of the risk of modern slavery occurring on the sites it is in control of. The improved supply chain due diligence processes implemented during 2020 and 2021 have resulted in greater knowledge, control and therefore confidence in compliance with the Modern Slavery Act by BYES' supply chain partners.

Notwithstanding the above, 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 further developing its due diligence of its supply chain and management of the risks, working with its supply chain partners to foster best practice. 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 would be investigated internally and, where appropriate, reported to the Modern Slavery Helpline, the Gangmasters and Labour Abuse Authority and/or local police. Appropriate risk assessments would have been undertaken specific to the relevant concern. To the best of its knowledge, no cases have been reported on BYES sites during 2021.

7. Training in relation to slavery and human trafficking

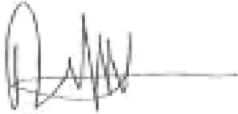
In 2021, BYES:

- Trained 88% of its new starters via its online training module highlighting how to spot the signs, how to report and BYES' policy on modern slavery;
- Continued to make available a toolkit of materials and supporting communications for use on its 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 BYES' 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;
- engaged Action Sustainability to host workshops for key internal stakeholders focusing on supply chain risks and mitigations.

8. Conclusion

This Statement was approved by the Boards of Bouygues E&S Solutions Limited and Bouygues E&S Infrastructure UK Limited on 30 June 2022. It was produced pursuant to section 54(1) of the Modern Slavery Act 2015 and reviewed and approved by each of the individual subsidiaries and affiliated entities of those companies which have obligations under the Act.



David Carr
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