



# Slavery and Human Trafficking Statement

1 January 2023 to 31 December 2023

## 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**). 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.

*"It is everyone's duty to comply with the Code of Ethics to enable the entire Bouygues group to continue its development."*

**Martin Bouygues, Chairman**

The Statement sets out what BYES has done in the financial year ending **31 December 2023** to work towards the prevention of slavery and human trafficking in its businesses or supply chains.

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

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 201,400 employees worldwide and operates in over 80 countries.

In October 2022 Bouygues SA acquired Equans. Equans forms the largest standalone division of the Bouygues Group. BYES is part of the Equans division. Globally, Equans is a world leader in energy services with nearly 100,000 employees working in more than 50 countries, with an annual turnover of over €18.8 billion. Equans is committed in all circumstances to act in accordance with the local laws and regulations in force in the countries where it operates and in accordance with the ethical principles of the Bouygues Group. These ethical principles guide the strategic decisions of Equans' management, as well as the practices of its employees.

*"For Equans, ethics is an integral part of its strategy, management and professional practices. It is a vector of performance."*

**Jerome Stubler, Equans CEO**

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 and data centres for both public and private sector clients.

In the United Kingdom, BYES has over 280 employees.

As a leading works and 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 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 and process engineering), 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 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;
- **Travel** – mobility is essential and BYES works with a service provider which manages its transportation and accommodation bookings; and
- **Purchasing of Goods & Materials** – BYES purchases goods and materials to support delivery of its services as well as on behalf of its clients.

### 3. Policies and procedures 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 compliance team to whom breaches of any of the following policies can be notified.

In particular, the following policies and procedures are directly relevant to the subject matter of this Statement:

- **Code of Ethics** (found at <https://www.bouygues.com/wp-content/uploads/2022/12/code-of-ethics-en-en.pdf>) - The Code requires all Bouygues Group 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. The Code was updated in 2022.
- **Values (ARTS)** – BYES' core values guide the company and its employees in daily decisions and actions and define the way the company engages with employees, clients, its supply chain and third parties. The core values are:
  - **Accountability:** Taking ownership, showing integrity and setting high standards in everything we do.



- **Respect:** Listening and caring about others
- **Team spirit:** Collaborating and trusting each other to reach a common goal.
- **Service focused:** Meeting our customers' needs in a proactive and pragmatic way.
- **Harassment & Bullying Policy** – This policy seeks to ensure that all employees are treated with dignity and respect, free from harassment and other forms of bullying at work. It sets out examples of the type of conduct that may constitute harassment or bullying and provides a framework for resolving complaints of harassment or bullying and stopping behaviour that is causing offence.
- **Anticorruption code of conduct** - A practical guide setting out the behaviour to adopt in all situations to avoid any breach of the ethical rules and, therefore, BYES' core shared values.
- **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 and Whistleblowing Facility** – BYES encourages all employees to raise any concerns that they may have about potential fraud, misconduct or wrongdoing in the business or the way in which the business is run. BYES's Whistleblowing Policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with. In addition, the Bouygues Group has rolled out a secure system for collecting and processing whistleblowing alerts (<https://alertegroupe.bouygues.com/>). The system is accessible to all and guarantees the confidentiality:
  - of the whistleblower's identity;
  - of the identity of the persons implicated in the whistleblowing alert; and
  - of any other information obtained.
- **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.
- **CSR Charter for Suppliers and Subcontractors** – Updated in 2022, this charter sets out the the key commitments that must be upheld by suppliers and subcontractors wanting to do business with the Group. Failure to uphold the rules outlined in this document, which is appended to orders and/or contracts managed by each purchasing department within the Group, can lead to measures up to and including termination of the contract. 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.

These policies and platforms are available on BYES' Internal Management System, on the Bouygues Group Website (<https://www.bouygues.com/en/ethics-and-compliance/>) and/or are made available to the supply chain during procurement.

#### 4. Due diligence processes

BYES and its supply chain are expected to live up to and adhere to the principles set out in the BYES Anti-Slavery and Human Trafficking 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, or 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 CSR Charter for Suppliers and Subcontractors, including the potential termination of the business relationship.

Recruitment of labour is channeled through a limited number of accredited 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 to ensure that all legislation applicable to workers are complied with. The labour agencies are also required to comply with BYES' Anti-Slavery and Human Trafficking Policy. The framework agreement authorises BYES to conduct audits to establish, 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.

BYES' site teams hold meetings with subcontractors and consultants during which labour standards, health and safety, payment and performance issues are discussed. BYES' staff also conduct performance assessments of the supply chain, which involve scoring on the BYES internal platform using several criteria including environment, quality, resources, safety and sub-supply chain. Intrinsicly this includes the well-being of supply chain 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 on future projects.

BYES' Business Review meetings with members of its key supply chain is another way in which supply chain performance is assessed. These meetings also review compliance with BYES' contractual requirements such as the CSR Charter for Suppliers and Subcontractors and the Anti-Slavery and Human Trafficking 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.

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' risk assessment and heat mapping of modern slavery risks in its supply chain, together with its gap analysis against BYES' existing policies, procedures and activities, has enabled BYES to better detect and address any potential labour exploitation and human trafficking, identifying which supply chain sectors were most at risk of containing modern slavery.

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 in connection with subcontractors. The heat mapping exercise provides further clarity on high-risk members of the BYES supply chain and has enabled the business to develop and prioritise its future actions.

BYES employs 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 whistleblowing.

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' Anti-Slavery and Human Trafficking Policy;
- suitable due diligence of sub-sub-contractors and equivalent contractual terms to ensure compliance with the Act; and
- termination of the supplier/subcontractor/consultant in the event of breach of the Act.

BYES also requires its supply chain to comply with the terms of the CSR Charter for Suppliers and Subcontractors. 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 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 supply chain due diligence processes continue to result in greater knowledge, control and therefore confidence in compliance with the Modern Slavery Act by BYES' supply chain partners.

Notwithstanding, BYES 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 2023.

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

BYES has trained over two-thirds of current employees via its online training module highlighting how to spot the signs of modern slavery, how to report it and BYES' policy on modern slavery.

BYES has prepared and distributed materials and supporting communications to raise awareness of modern slavery and BYES' policy on modern slavery. These materials include posters for display on site urging anyone who is affected by modern slavery or who has a suspicion that modern slavery may be occurring on one of BYES' sites to report the matter to their line manager, BYES' dedicated modern slavery reporting mailbox, BYES' hotline or online platform, or the relevant authorities so that the matter can be addressed.

The company also hosted formal training for its supply chain with the support of the Sustainability Supply Chain school to ensure they:



- have an improved understanding of the Modern Slavery Act;
- are able to identify the signs of slavery;
- gain some insight into the strategic framework that can be used to support with transparency in supply chains; and
- know how to notify any concerns.

## 8. Conclusion

This Statement was approved by the Board of Bouygues E&S Contracting Limited on 20 December 2024. It was produced pursuant to section 54(1) of the Modern Slavery Act 2015.

DocuSigned by:

A handwritten signature in blue ink that reads "Steven Weir". The signature is written in a cursive style and is enclosed within a blue rectangular box.

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**Steven Weir**  
**Chief Executive Officer of Bouygues E&S Contracting UK Limited**