

Modern Slavery Statement 2025



**Equans UK & Ireland
Business Unit
"Equans UK"**

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Our Commitment

Modern slavery is a serious crime that can take many forms and exists across borders and sectors. It disproportionately affects vulnerable people, often remaining hidden because individuals feel unable to speak out or leave their situation.

At Equans, we are committed to doing business responsibly and with integrity. Our culture of performance is underpinned by three non negotiable priorities across the Group - our three "must haves": Ethics, Health & Safety, and Cyber Security. Respect for human rights, including the prevention of modern slavery, sits at the heart of these priorities and guides how we operate in the UK and globally.

We recognise that addressing modern slavery requires vigilance, accountability and collaboration. It is a shared responsibility, and we work closely with our employees, clients, suppliers and partners to identify, prevent and manage risks wherever they may arise across our operations and supply chain.

This statement sets out the steps taken by Equans Holding UK Limited ("Equans", "we" or "our") and its UK subsidiaries in accordance with section 54(1) of the Modern Slavery Act 2015. It covers the financial year ending 31 December 2025 and explains how we work to prevent modern slavery and human trafficking within our business and supply chain.

As CEO, I personally commit to ensuring, together with my senior leadership team, that we maintain a culture where modern slavery is not tolerated in any form within our business or supply chain.



Jean-Philippe Loiseau
CEO Equans UK & Ireland

Date

30/06/2026



Equans UK

Our aim is to serve the energy, digital and industrial transitions of our customers by providing low-carbon energy solutions, cutting edge technical FM services and transformative regeneration services.

To deliver these services, our workforce (approximately 11,000 employees) and activities have been organised into four operating divisions:

Digital & Energy Services, Sustainable Facilities Management and Places & Communities. Our fourth division, VIVO, is a joint venture between Equans and Serco, and publishes its own modern slavery statement.

In addition to these operational divisions, we have a number of central corporate functions which include IT, Legal & Ethics, Procurement, Health & Safety, Environment, HR, Finance and Sustainability. These central functions are supported by our shared services centres, Equans Business Services.



Modern Slavery Risk Assessment

Internal Workforce

We maintain robust employment practices in relation to the recruitment and management of our employees and temporary workers as per our due diligence process described below.



Supply Chain

Our supply chain comprises over 10,000 suppliers and subcontractors, the majority of which are based in the UK and the Republic of Ireland. Given the diverse nature of our business activities, our supply chain spans various competencies and industries.

We have worked with Action Sustainability (leading consultants in the fields of sustainable business and supply chain management) to train our procurement team and to identify the categories of spend which present a higher risk from modern slavery.

To perform this risk assessment process, we considered the risks associated with the country or territory that goods or services were directly or indirectly sourced from, whether the category of spend is reliant on low, unskilled, temporary or migrant labour, whether worker's rights were respected and protected within the sector and whether recent or anticipated material or labour shortages had increased the risk of modern slavery.





As a result of this comprehensive supply chain risk assessment, we have identified the following categories of spend which present a higher risk of modern slavery or human trafficking:

1. **Construction Services:** This category encompasses scaffolding providers, fabric services, and mechanical and electrical (M&E) services.
2. **Temporary Recruitment:** The engagement of temporary workers presents inherent risks.
3. **Catering Services:** Providers of catering services are closely scrutinised due to their potential exposure to exploitation.

4. **Cleaning Services:** Cleaning contractors are monitored for compliance with ethical standards.

5. **Grounds Maintenance Services:** This category involves work that may attract vulnerable labour.

6. **Waste Management Services:** Vigilance is essential, given its labour-intensive nature.

7. **The procurement of EV chargers and photovoltaic (solar) panels:** The raw materials for these products are often sourced from countries/territories with poor human rights records, and in some cases those products are assembled in those areas with poor human rights records.

The risks described above are managed through our Policies and Procedures, our Due Diligence processes and Training, each of which are described below.

The deployment of our new digital procurement platform (E PROC) has supported consistency, transparency and auditability across supplier onboarding, due diligence and ethical compliance checks, supporting improved identification and management of modern slavery risk.



Our Policies & Practices in Relation to Modern Slavery

Our policies and procedures in relation to modern slavery

Oversight of modern slavery and human rights risk management sits within our Ethics governance framework, with clear senior leadership accountability and regular reporting to the Executive leadership team. To support effective delivery and continuous improvement, we have established a cross functional working group comprising representatives from Legal, Procurement, HR, CSR and the Chief Procurement Officer function.

We have implemented a number of policies and procedures to enable us to proactively manage the risks of modern slavery within our business and supply chains.

Bouygues Group Code of Ethics

Our Group's Code of Ethics requires every employee to take seriously their role in building and protecting our reputation and sets out expected behaviours for all employees.

Bouygues Group Human Rights Policy

Respect for human rights is a fundamental value of the Bouygues group, and this value underpins each of the twelve commitments which are enshrined within the Bouygues group's Human Rights Policy.

Most notably, the first two commitments within this Policy set out that the group will not tolerate any form of forced or illegal labour and they align with recognised international human rights frameworks, including the UN Guiding Principles on Business and Human Rights and ILO standards.

Equans UK & Ireland Modern Slavery Policy

This Policy sets out our specific commitments in relation to modern slavery. We expect our staff, leadership team and supply chain to support these commitments throughout all of their professional activities.

Equans group Ethics booklet

This booklet consolidates all of our key ethics policies and sets out the rules that staff are expected to follow at all times. The booklet, which is accessible to all employees through our intranet, also provides staff with practical examples for dealing with ethical incidences that they may encounter in the workplace.

Supplier Charter

Signatories to our Supplier Charter commit to supporting us in delivering social, economic, and environmental value to our customers and the communities we serve. The Charter includes mandatory commitments for our supply chain in relation to ethics, anti-bribery and corruption, modern slavery, and anti-discrimination standards.

We are committed to ceasing trading with members of our supply chain that show disregard for important elements of environmental, social and ethical performance.

Our standard supply chain's contracts reinforce these expectations through explicit modern slavery and human rights requirements, including audit rights and contractual enforcement where serious or persistent breaches are identified.

Whistleblowing - reporting concerns

Potential instances of unethical behaviour, modern slavery or other forms of inappropriate behaviour can be reported anonymously and in confidence via our whistleblowing platforms. Details of these platforms are available on our website (www.equans.co.uk/ethics) and on posters displayed across our offices and sites. These platforms are available to Equans employees, agency workers and supply chain workers in multiple languages.

Our whistleblowing arrangements provide a clear escalation route for concerns relating to modern slavery or human rights, with reports investigated and appropriate actions taken in line with our policies.

Following a thorough audit which was conducted by EcoVadis in 2025, Equans Services Limited was awarded a gold rating in respect of its activities in the fields of ethics and CSR. This recognition reflects our commitment to ethical business practices and our dedication to raising awareness and prevention of modern slavery in all its forms.



Our Due Diligence Process

In our own operations

Our Employee Screening Policy requires right to work checks and other screening to be undertaken (where appropriate) to ensure appropriate and safe appointments to all roles. We also perform regular checks to establish whether a single residence and/or bank account are used by more than one employee, factors which could be indicators that a worker is being held in slavery.

Modern slavery indicators and worker welfare considerations are also included within site assurance activities, including SHEQ audits and leadership site visits, supporting greater on the ground visibility of potential risks.

The majority of our temporary labour is sourced through a single Managed Service Provider, with contractual requirements covering robust onboarding checks, regular audit and reporting on modern slavery and human trafficking risks.

Our contractual relationship with this provider requires them to undertake robust onboarding checks before a worker is

engaged, perform regular audits on workers and produce an annual slavery and human trafficking report, setting out the measures they have taken to prevent incidences of slavery and human trafficking.

We require ethical recruitment practices, including no worker paid recruitment fees, and that workers receive clear terms and conditions they understand.

In our supply chain

Prior to their engagement, all supply chain members are required to complete an onboarding questionnaire and are subject to a due diligence process. As part of this process, potential supply chain members are required to set out the risk assessment and due diligence measures they have implemented to mitigate the risk from modern slavery within their own organisation and supply chain. All suppliers are required to notify us if they discover any actual or suspected slavery or human trafficking within their organisation or supply chain.

We have implemented an enhanced annual due diligence programme for preferred and

strategic suppliers to our business, although that programme was partially paused during 2025. During that time, we applied a risk based prioritisation approach which focused specifically on higher risk categories of spend. The enhanced programme will be fully reinstated in 2026.

To manage the potential human rights risks associated with the procurement of solar (PV) panels, we leverage the presence of local Bouygues Group companies operating in the countries of manufacture to coordinate local audits, working with approved auditors and partners. Where risks are identified, improvement action plans are implemented to address health & safety practices and modern slavery risks.

Our standard supplier terms include modern slavery requirements, including the right to audit and expectations that suppliers apply equivalent standards through their own supply chains.

Contractual enforcement, including potential termination, will be applied where serious or persistent breaches are identified.

Training our Employees and Suppliers

We strongly believe that education is a powerful tool in the fight against modern slavery.

Employees

Every new member of our team is required to participate in a comprehensive ethics training programme upon joining the company. This includes a specific training module designed to equip our staff with the necessary skills to identify potential signs of modern slavery and understand the appropriate steps to report those concerns via our whistleblowing platforms.

Supply chain

Equans UK is committed to extending its ethical standards and practices beyond its immediate organisation. As part of this commitment, we provide our supply chain partners with access to training resources from the Supply Chain Sustainability School. This platform offers a wealth of information and learning opportunities, further supporting our partners in their efforts to uphold ethical business practices and identifying incidences of modern slavery.

Beyond our own operations, Equans actively engages in external forums, workshops and sector wide initiatives focused on modern slavery and human rights. Through collaboration with industry peers, professional bodies and specialist organisations, we contribute to raising

awareness, sharing good practice and strengthening collective approaches to identifying and addressing modern slavery risks across the sector

To further support our training efforts, we have developed a 'Modern Slavery – Spot the Signs' poster campaign. This visual aid, displayed prominently in several languages at our offices and sites, serves as a constant reminder of the signs of modern slavery and reinforces the importance of reporting any concerns in a timely and effective manner.

The materials have been translated in multiple languages to ensure they are accessible and easily understood by our diverse workforce and supply chain, recognising that clear communication is essential to protecting vulnerable individuals.

Measurement of Our Progress

At Equans UK, we believe in the importance of accountability and continuous improvement. To this end, we have developed a set of key performance indicators (KPIs) to monitor and report our performance. Where enhanced due diligence activity was paused during 2025, this has been transparently reflected in our performance reporting, with actions in place to restore full coverage.

These KPIs include:

- ✓ **Employee Training Completion:** As of 31/12/2025, 75.8% of our employees had participated in modern slavery training
- ✓ **Due Diligence Investigations:** In 2024, 100% of our preferred and strategic suppliers were subject to enhanced due diligence. As set out above, this enhanced annual programme will be reinstated in 2026.

Additional indicators monitored include the number of audits and site assurance activities completed across our operations and supply chain, supporting ongoing identification of potential modern slavery risks.





Our Future Plans

During 2026 we will start using IntegrityNext as a tool for assessing Environmental, Social, and Governance risk within our supply chain members. In particular, the platform will better enable us to identify and manage modern slavery and human rights risks within our higher risk categories of spend.

From 2026, we will expand the scope of site audits conducted by our Health and Safety teams to include structured worker interviews designed to identify potential indicators of modern slavery, complemented by management and leadership site visits where appropriate.

In 2026, Bouygues SA is delivering dedicated human rights and modern slavery training for its senior leaders, with participation from Equans leadership, strengthening awareness and accountability at senior level across the Group.



