



Slavery and Human Trafficking Statement

1 January 2025 to 31 December 2025

1. Purpose

This statement (the **Statement**) is made on behalf of Equans Specialist Contracting UK Limited ("**ESC**") 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 ESC to make an annual statement setting out the steps taken to ensure there is no slavery within its business or supply chain.

ESC 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.

The Statement sets out what ESC has done in the financial year ending **31 December 2025** to work towards the prevention of slavery and human trafficking in its businesses or supply chains.

2. ESC's structure, business and supply chain

ESC operates under two distinct brand/trading names. These are:



This brand name is used by ESC in connection with its life science, science and technology business (including clean rooms, laboratories, process and manufacturing).



This brand name is used by ESC in connection with its data centre business.

ESC is a subsidiary of Equans Group UK Limited and is part of Equans. Globally, Equans is a world leader in the energy and services sector with circa 83,000 employees working in more than 20 countries. Globally, Equans has an annual turnover of circa€18.7 billion.

Equans forms the largest standalone division of the Bouygues Group; 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.

ESC and Equans are committed in all circumstances to act in accordance with the laws and regulations in force in the countries where they operate and in accordance with the ethical principles of the Bouygues Group. These ethical principles guide the strategic decisions of ESC's and Equans' management, as well



as the practices of their 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

Equans 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

ESC's activities in the UK include engineering, construction, servicing and maintenance of highly technical facilities in critical and controlled environments. ESC 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, ESC has over 280 employees.

As a leading works and services provider, ESC has a complex supply chain model that both supports its core businesses and maintains its office and technology infrastructure. ESC's 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 ESC's core business;
- **Travel** – mobility is essential and ESC works with a service provider which manages its transportation and accommodation bookings; and
- **Purchasing of Goods & Materials** – ESC 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

ESC 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 policies mentioned below can be notified.

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

- **Code of Ethics** - ([CODE OF ETHICS.pdf](#)). The principles enshrined in the Code are rooted in international conventions including (but not limited to): the Universal Declaration of Human Rights and Additional Protocols, the Standards of the International Labour Organisation, the Guidelines for Multinational Corporations laid down by the Organisation for Economic Cooperation and Development and the United Nations Convention against Corruption. Ethical conduct is one of the cornerstones of the Bouygues Group, along with Safety and Cybersecurity. All employees are required to sign a commitment to uphold ethical standards and to act in accordance with the Code of Ethics.
- **Fundamentals** - Our fundamentals are the principles we live by every day. They guide how we work together, how we support our clients, and how we build trust across our communities. They are the foundation of our culture and the way we succeed as one team. They are:
 - **Respect** – We value every individual and recognise the contribution each person makes.
 - **Commitment** – We take responsibility, stay fully involved, and hold ourselves to high standards.
 - **Pioneer** – We innovate with purpose, bringing bold ideas to life through expertise and precision.
 - **Sharing** – We grow stronger by sharing our knowledge, experiences, and successes with each other.
 - **Service Focused** – We anticipate client needs, go the extra mile, and consistently deliver excellence
- **Group Core Ethical Values** – The Equans Group core ethical values guide ESC and its employees in daily decisions and actions and define the way ESC engages with employees, clients, its supply chain and third parties. The Equans Group's core ethical values are:
 - **Respect:** Respect is one of the Group's key values and must guide everyone in their individual behaviour, whether internally in dealings with the Equans' employees and senior executives, or externally in dealings with stakeholders and all third parties.
 - **Integrity:** Equans places a high value on strict compliance with laws, regulations and internal standards, particularly as regards the fight against corruption and influence peddling; competition law; stock market regulations; economic sanctions; prevention of conflicts of interest; human rights; fundamental freedoms; environmental protection; health, safety and security in the workplace; and personal data protection.
 - **Responsibility:** All senior executives and employees have a duty to respect professional ethics based on the Equans shared values, the rules and principles of action set out in the Code of Ethics, the Anti-Corruption Code of Conduct, the compliance programmes and policies.
- **Harassment & Bullying Policy** – This policy seeks to ensure that all employees are treated with dignity and respect and are 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 for stopping behaviour that is causing offence.
- **Anticorruption code of conduct** - A practical guide ([anti-corruption-code-of-conduct.pdf](#)) setting out the behaviour to adopt in all situations to avoid any breach of the ethical rules and, therefore, Equans' core shared values.
- **Authority Limits and Contract signing Policy** – ESC's internal control and governance procedures with regard to approving financial transactions and signing contracts with clients and suppliers ensure that contracts cannot be entered into without an appropriate level of review and authorisation by suitably senior and qualified members of staff.
- **Whistleblowing Policy and Whistleblowing Facility** – The Whistleblowing system is a mechanism placed at the disposal of Equans Group's employees and stakeholders for reporting actions or behaviours that



may compromise individuals' integrity and/or rights, that may affect the Group's activities, or create serious liability (health and safety, environment, human rights, individual rights, privacy, etc.). The whistleblower must be a natural person acting without direct financial incentive and in good faith. Whistleblowers can report an incident, anonymously or not, through <https://equans.besignal.com/>.

- No retaliatory measures (legal or disciplinary), linked to the alert, will be taken against the whistleblower.
- An external service provider receives all the alerts, guaranteeing the confidentiality of any information they contain and fulfilling all legal obligations. Anonymous information is addressed to the Group Ethics, Compliance & Privacy Department for it to be investigated.
- **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** – [2025 - Equans x BY SA - CSR charter for suppliers and subcontractors 1.pdf](#) This charter sets out 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 can lead to measures up to and including termination of the contract. ESC's 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. ESC works with its supply chain to ensure that they meet the standards of the Charter.

These policies and platforms are available on ESC's Internal Management System, on the Equans Group Website (<https://www.equans.com/about-us/ethics-compliance>) and/or are made available to the supply chain during procurement.

The Equans Group has built a strong Ethics, Compliance & Privacy (ECP) network that oversees the incorporation of ethics into the Group's strategy, management and practices. It proposes ethics and compliance policies and procedures for the Group. It supports their implementation at all levels of the Group. This network is coordinated by the Ethics, Compliance & Privacy Department and the Group Ethics Officer and is effective across the entire Group:

- More than 90 people in Ethics & Compliance.
- More than 50 people in Data Privacy.

4. Due diligence processes

ESC and its supply chain are required to adhere to the principles set out in the ESC Anti-Slavery and Human Trafficking Policy and demonstrate progress towards the standards set out in it.

ESC's procurement practices require that all new members of its supply chain are subject to an appropriate level of screening. The scope of the screening ESC 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.

ESC's 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;
- invoking contractual sanctions against supply chain partners that fail to improve their performance or 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 ESC 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 is complied with. The labour agencies are also required to comply with ESC's Anti-Slavery and Human Trafficking Policy. The framework agreements authorise ESC 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.

ESC carries out pre-enrolment Right to Work checks by verifying identity documents, confirming Home Office status and issuing a compliant RTW report before anyone is allowed on site.

ESC's site teams hold meetings with subcontractors and consultants during which labour standards, health and safety, payment and performance issues are discussed. ESC's staff also conduct performance assessments of the supply chain, which involve scoring using several criteria including environment, quality, resources, safety and sub-supply chain. Intrinsically this includes the well-being of supply chain staff. This allows ESC to continuously monitor the performance of its supply chain and to act promptly when performance falls below the required standards. The scores are considered in ESC's decision to engage supply chain partners on future projects.

Business review meetings with members of ESC's key supply chain is another way in which supply chain performance is assessed. These meetings also review compliance with ESC's 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 ESC's anti-slavery initiatives is held by the ESC board and ESC's directors.

Section 2 above sets out ESC's principal business activities. ESC considers that the following of those activities could present a higher risk of slavery or human trafficking taking place:

- **Labour supply;**
- **Subcontracting; and**
- **Purchasing of goods & materials.**

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

ESC has a central procurement function that assesses and manages the procurement of high value and/or high-risk goods and services in accordance with Equans' 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 Equans' supply chain and has enabled the business to develop and prioritise its future actions.

Equans employs lawyers to ensure compliance with its legal and ethical obligations.

ESC 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.

ESC includes model clauses on the Act in all of its contracts with its suppliers, subcontractors and consultants requiring:

- compliance with the Act and with ESC's 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.

ESC also requires its supply chain to comply with the terms of the CSR Charter for Suppliers and Subcontractors. By adopting this Charter, ESC's supply chain undertakes to act in accordance with and implement all the principles it contains (including measures to combat modern slavery) and to ensure that its own suppliers do likewise.

6. Evaluating ESC's effectiveness

ESC 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 its sites. The supply chain due diligence processes continue to result in greater knowledge, control and therefore confidence in compliance with the Modern Slavery Act by ESC's supply chain partners.

Notwithstanding, ESC 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 ESC 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.

No incidents of Modern Slavery have been reported on ESC sites during 2025.

7. Training in relation to slavery and human trafficking

ESC has trained all current employees via its online training module highlighting how to spot the signs of modern slavery, how to report it and ESC's policy on modern slavery.

ESC has prepared and distributed materials and supporting communications to raise awareness of modern slavery and ESC's 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 ESC's sites to report the matter to their line manager, Equans' dedicated modern slavery reporting channels, or the relevant authorities so that the matter can be addressed.

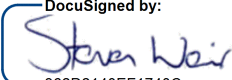
The company has also hosted formal training for its supply chain with the support of the Sustainability Supply Chain school to ensure they:



- 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 Equans Specialist Contracting UK Limited on 7th July 2026.
It was produced pursuant to section 54(1) of the Modern Slavery Act 2015.

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Steven Weir
Chief Executive Officer of Equans Specialist Contracting UK Limited