Slavery and Human Trafficking Statement

June 2021

1. Purpose

This statement (the **Statement**) is made on behalf of Bouygues (UK) Limited and all its subsidiaries and affiliated companies in the United Kingdom which includes BY Development Limited trading as Linkcity (together, **Bouygues**) pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**).

Bouygues 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. Bouygues 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 Bouygues 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. Bouygues' structure, business and supply chain

Bouygues is a provider of development, regeneration and construction services in the United Kingdom to both public and private sector clients. It has around 960 direct employees in the UK. Bouygues 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. Some examples of projects in the UK are Cambridge Assessment and Cavendish III Laboratory, Tower Hamlets Town Hall, UCLH Proton Beam Therapy Centre, Hallsville Quarter, Canning Town Regeneration.

As a leading developer and construction contractor, Bouygues has a complex supply chain model that both supports its core businesses and maintains its office and technology infrastructure. Bouygues' supply chains relate mainly to the following activities:

- ***Subcontracting*** – the specialist contractors necessary to deliver certain construction operations on Bouygues construction sites;
- ***Consultancy*** - professional and consultancy services from design professionals in various fields, including, without limitation, architecture, engineering (such as structural, civil, façade and mechanical and electrical), lighting, landscape design, sustainability, access consultancy, 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 offices and 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 Bouygues' core business; and
- ***Travel*** –mobility is essential and Bouygues works with a number of travel providers such as hotels and airlines.

3. Policies in relation to modern slavery and human trafficking

Bouygues 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 Bouygues fully respects its clients and collaborators, the environment and all its stakeholders and that through its actions Bouygues 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 Bouygues group's operations.
- ***Health & Safety policy*** – this policy sets out Bouygues' 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 Bouygues' 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 Bouygues' 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*** – this policy encourages employees to bring any 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 Charter for Suppliers and Subcontractors (the "Charter")*** - the Charter is a contractual requirement, setting out the obligations for Bouygues' 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. Serious violations of the Charter will lead to the termination of the business relationship.

These policies are available on the Bouygues Internal Management System accessible to all its employees.

In October 2020, Bouygues launched a 'Speak Up' Campaign in which Bouygues introduced an independent partner providing a telephone hotline and an online platform for employees to report incidences of harassment and bullying confidentially and anonymously. This ensures that those at risk and who may not have immediate access to email, are able to report any concerns on a timely basis.

4. Due diligence processes

Bouygues 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.

Bouygues' procurement practices require that all new suppliers are subject to an appropriate level of screening. The scope of the screening Bouygues 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 and/or site inspections. Bouygues' PAS091 compliant pre-qualification protocol and Invitations to Tender (via its ConstructionLine registrations and verifications process) include questions about commitment to addressing modern slavery and human trafficking. Any applicant (to which the Act applies) which, for example, has not published the required s54 statement, will not pre-qualify for the Bouygues supply chain as a result.

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

During 2020, Bouygues further strengthened its tender processes for the engagement of labour agencies and entered into framework agreements with 6 labour agencies meaning that recruitment of 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 Bouygues' Modern Slavery policy. The framework agreement authorises Bouygues 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.

During 2020, Bouygues made additional contact with the core members of its supply chain to ascertain and understand the challenges they were facing due to the COVID-19 pandemic to be satisfied that the policies and procedures set out in Section 3 continued to be upheld the required standards.

Bouygues is a member of the Supply Chain Sustainability School. Bouygues promotes best practice by encouraging its supply chain to become partners of the Supply Chain Sustainability School, thereby gaining access to all the online resources and training events offered by the School.

Furthermore, Bouygues' Preferred Supplier Charter introduces the following sustainability requirements in order for any supply chain member to be considered as preferred:

- To comply with the Act and Bouygues' Modern Slavery policy;
- To commit to becoming a Supply Chain Sustainability School Bronze member by completing the confidential self-assessment and accessing a prioritised 10-point Action Plan with associated resources and thereafter working towards completing a re-assessment and gaining Silver membership status.

5. Risk assessment and management

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

Bouygues also employs a team of lawyers and has compliance officers to ensure compliance with its legal and ethical obligations. In addition, Bouygues created a Modern Slavery Working Group with senior members of its 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 its supply chain and in the implementation of strategies and reporting.

Bouygues has in place appropriate processes for reporting concerns with the business, including a whistleblowing policy and a designated Compliance Officer and Deputy Compliance Officer.

It is considered that subcontracting and the supply chain, as set out in Section 2 above, is an area of Bouygues' 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 Bouygues engaged an external consultant to assist with a full risk assessment and heat mapping of its supply chain and the key modern slavery risks in Bouygues' supply chains were identified. A gap analysis was also conducted against Bouygues' existing policies, procedures and activities enabling Bouygues 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 Bouygues to develop a forward- looking strategy prioritising its areas of focus in the coming years.

Bouygues has a central procurement function that assesses and manages the procurement of high value and/or high-risk goods and services in accordance with Bouygues' procurement practices and formal tendering procedures. This function has previously 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 has provided further clarity on high risk subcontractors and suppliers and enabled the business to develop and prioritise its future actions.

Bouygues includes model clauses on the Act in all of its contracts with suppliers, subcontractors and consultants requiring compliance with the Act, compliance with Bouygues' 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.

Bouygues also requires its supply chain to comply with the terms of the Bouygues Corporate Social Responsibility Charter for Suppliers and Subcontractors. By adopting this Charter, the supply chain undertakes to act in accordance with and implement all the principles it contains and to ensure that its own suppliers do likewise.

6. Evaluating Bouygues' effectiveness

Bouygues recognises that some areas of the business are exposed to parts of the industry that could be considered high risk and are committed to undertaking further developed due diligence of its supply chain. 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.

In January 2020 as part of the submission of a tender with the UK Government being the Client, Bouygues completed an assessment via the Government's Modern Slavery Assessment tool, which assists them in the identification and management of modern slavery risks in its supply chain. The areas of policy and procedure, risk assessment and management, and training were considered to be strong, with more focus needed in the areas of governance, due diligence and KPIs. Bouygues received recommendations on how it could better manage modern slavery risks in its business and supply chain and is working towards implementing those further recommendations.

Any potential concerns about incidents of Modern Slavery on Bouygues 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 Bouygues' knowledge, no cases have been confirmed by the authorities.

7. Training in relation to slavery and human trafficking

In 2020 Bouygues:

- Trained all its new starters as part of their induction via online training module highlighting how to spot the signs, how to report and Bouygues' policy on modern slavery; and
- Developed and issued a toolkit of materials and supporting communications for use on Bouygues' construction sites to raise awareness of modern slavery, how to report, immediate action to take and Bouygues' policy on modern slavery. The materials included 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 the Bouygues sites to contact their line manager, Bouygues' dedicated modern slavery reporting mailbox, its hotline and online platform or the relevant authorities so that the matter can be addressed. These posters are displayed in the communal areas of Bouygues sites;
- 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 (UK) Limited on behalf of Bouygues on 29 June 2021. It was reviewed and approved by each of the individual subsidiaries and affiliated entities of Bouygues which has obligations under the Act.



Fabienne Viala,
Chair of Bouygues (UK) Limited