BUILDING FOR LIFE

Slavery and Human Trafficking Statement

1 January 2023 – 31 December 2023

1. Purpose

This statement (the **Statement**) is made on behalf of Bouygues (U.K.) Limited and all its subsidiaries and affiliated companies in the United Kingdom which includes BY Development Limited (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 2023** 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 700 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 201,500 employees worldwide and operates in some 80 countries. Some examples of projects in the UK are the Cambridge Assessment and Cavendish III Laboratory, Hallsville Quarter Phase 3 residential works, Tustin Estate Phase 1 residential works, Moorfields Eye Hospital, Cotswolds Design Outlet and Pentre Awel residential works.

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.

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. The Code was updated in 2022;
- *Responsible and Committed* – this is a CSR charter aiming to ensure that Bouygues fully respects its clients and employees, 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 as well as third parties such as suppliers, subcontractors and members of the public. A new group-wide Whistleblowing platform was implemented during 2023;
- *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. This was updated ready for reissue in early 2024 in order to reflect recommendations made by the Government's Modern Slavery Test, as further described in section 6 below; 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 or, where relevant, made available to the supply chain during the procurement process.

In addition to the Group-wide whistleblowing platform, Bouygues' 'Speak Up' Campaign continues to run with an independent partner providing a telephone hotline and an online platform for employees to report incidences of harassment

and bullying confidentially and anonymously 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, 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' Common Assessment Standard 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: All new subcontractors are required to achieve Constructionline Gold or the Common Assessment Standard certification, which includes enhanced due diligence and questions on compliance with the Modern Slavery Act and associated corporate social responsibility risks. Consultants who are designers are required to achieve Constructionline Silver plus SSIP or the Common Assessment Standard certification. Any applicant (to which the Act applies) which, for example, has not published the required s54 statement, may not pre-qualify for the Bouygues supply chain as a result and therefore will not be eligible for new work.

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 conducts quarterly key performance indicator assessments of its subcontractors and consultants. These assessments involve scoring them on the Bouygues Construction Management software, and the scores are accessible through the Bouygues internal Supply Chain Management tool. The performance assessments utilise several criteria, including programme, resources, quality, 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 quarterly scores are considered in Bouygues' decision to engage these subcontractors and consultants in future projects. Bouygues' regular Business Review meetings with members of its strategic supply chain is another way in which their performance is reviewed and their compliance with Bouygues' contractual requirements such as the Charter, Modern Slavery and Health and Safety policies is also reviewed at these meetings.

Bouygues has entered into framework agreements with a limited number of 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. In 2023, the procurement and recruitment teams developed a questionnaire which was sent to Bouygues' newly engaged blue collar recruitment agencies, as a monitoring tool to ensure ethical practices.

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. In its quarterly newsletters to the supply chain, the procurement team actively promotes the advantages of becoming a partner with the School and highlights upcoming training sessions including those related to modern slavery.

Further, Bouygues initiated plans to hold a training session for its high-risk suppliers with the aim of increasing their understanding of the Modern Slavery Act and training them on Bouygues' anti-slavery policy. This session will be hosted by the Supply Chain Sustainability School.

Finally, Bouygues utilises Constructionline's Social Value Radar, which looks at areas of good labour practice which should reduce the risk of modern slavery in the supply chain.

5. Risk assessment and management

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

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

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.

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.

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.

Bouygues continues to utilise its risk assessment and heat mapping of the supply chain together with the gap analysis against Bouygues' existing policies, procedures and activities, which have enabled Bouygues 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. It also enabled the business to develop and prioritise its future actions. Partly as a result of this, we have implemented a process whereby higher risk supply chain members have been provided with a comprehensive questionnaire for response. This questionnaire aims to assess respondents' credentials and compliance in several key areas, including anti-slavery and human trafficking policies, previous convictions, whistle-blowing processes, recruitment policies, supplier checks, staff training, supplier code of conduct, engagement plans, and the use of goods from high-risk countries. The purpose of this initiative is to ensure that our higher risk supply chain partners meet the necessary standards and adhere to ethical practices throughout their operations.

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 to 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 further developing its due diligence of the supply chain and management of the risks, working with its supply chain partners to foster best practices. 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 2023 Bouygues completed an assessment via the Government's Modern Slavery Assessment tool ("**MSAT**"), 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 due diligence and KPIs. Bouygues received recommendations on how it could better manage modern slavery risks in its business and supply chain and an action plan was created with the aim of improving its approach to modern slavery. In 2023, in accordance with this action plan, the business began updating its Anti-slavery and Human Trafficking policy taking into account the recommendations of the MSAT.

Also as part of the action plan, KPIs were approved by the Board of Directors and implemented to measure the progress and effectiveness of Bouygues' actions against modern slavery. These KPIs cover the areas of procurement, training, site operations and communications. The expectation is that these enable greater accountability going forward.

Any potential concerns about incidents of Modern Slavery on Bouygues 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 be undertaken specific to the relevant concern. No cases were reported during 2023.

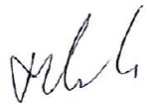
7. Training in relation to slavery and human trafficking

By the end of 2023 Bouygues:

- had trained 100% of its new starters as part of their induction via an online training module highlighting how to spot the signs, how to report and Bouygues' policy on modern slavery; and
- continued to make available 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 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 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.

8. Conclusion

This Statement was approved by the Board of Bouygues (U.K.) Limited on behalf of Bouygues on 28th June 2024. 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 (U.K.) Limited