setec consultants

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

www.setec.fr

This modern slavery and human trafficking statement is made on behalf of setec consultants, the holding company of setec group, and its subsidiaries which provide consultancy, design, engineering, and project management services in the construction sector in the United Kingdom (together **SETEC**) pursuant to section 54(1) of the UK's Modern Slavery Act 2015 (the **Act**) for the financial year ending 31st December 2023.

## Introduction

SETEC is opposed to all forms of slavery and takes its obligations in relation to slavery and human trafficking very seriously. SETEC is committed to acting ethically and with integrity in its business dealings and trying to ensure that the likelihood of modern slavery and / or human trafficking being present in its supply chains or business is minimised.

## SETEC companies

- **SETEC CONSULTANTS** is a limited joint stock company registered in France with registered number 412 736 639. Its registered office address is 42/52 quai de la Rapée, Cedex 12, 75583 Paris, France.
- **SETEC CONSULTING ENGINEERS LTD** is a limited company registered in England and Wales with registered number 10852689. Its registered office address is Wilberforce House, Station Road, London, NW4 4QE, United Kingdom.
- **SETEC INTERNATIONAL** is a simplified joint stock company registered in France with registered number 722 013 174. Its registered office address is 5 chemin des gorges de Cabriès, 13127 Vitrolles, France.
- **SETEC NUCLEAIRE** is a simplified joint stock company registered in France with registered number 901 422 659. Its registered office address is 42-52 Quai de la Rapée, Immeuble Central Seine, Cedex 12, 75583 Paris, France.
- **SETEC TPI** is a simplified joint stock company registered in France with registered number 672 038 288. Its registered office address is 42-52 Quai de la Rapée, Immeuble Central Seine, Cedex 12, 75583 Paris, France.

References to "SETEC", "we", "us" or "our" are references to the entities listed above.

Due to SETEC's wider group organisation, this statement is intended to cover only those entities within the SETEC group which provide consultancy, design, engineering, and project management services in the construction sector and which, collectively, meet the turnover requirements to produce a modern slavery

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statement. This slavery and human trafficking statement has been researched and prepared by the Legal Affairs Department of SETEC Group.

## Our supply chains

The supply chains SETEC uses to provide its services primarily relate to professional and business services. SETEC supply chains are composed by other services suppliers contracting directly with SETEC or through recruitment agencies which receive copy of SETEC Modern Slavery and Human Trafficking Policy.

## Risk Assessment and Due Diligence

The construction sector has been identified as one of the sectors most vulnerable to modern day slavery. This is largely as a result of its heavy reliance on temporary, manual and low-wage labour, which has been identified as high risk in terms of subjection to forced labour. However, as a professional services provider we consider our business activities to generally be low risk in relation to modern slavery and human trafficking.

SETEC considers the risk profile of all new third parties (ie suppliers, agents and consultants) and requires them to complete a pre-onboarding questionnaire, which includes various questions relating to compliance with modern slavery and human trafficking rules and regulations. Upon receiving the completed questionnaire, we assess whether the third party meets our standards and requirements, and ultimately whether it is appropriate for us to work with them.

SETEC ensures that its contracts with third parties include clauses confirming that the applicable third party conducts its business in accordance with all applicable laws and regulations, including (but not limited to) the Act.

SETEC values integrity, ethical behaviour and a strong commitment to human rights and endeavours to build relationships with its suppliers based on these principles.

## Our policies

SETEC has policies and procedures which are relevant in relation to modern slavery and human trafficking, and these set out our commitment to acting ethically and with integrity in our business dealings. These policies include a Modern Slavery and Human Trafficking Policy and an anti-corruption code of conduct.

In respect of recruitment specifically, SETEC only uses reputable employment agencies and consultants to source candidates. As part of its employee onboarding process, SETEC carries out due diligence to ensure that all employees have the legal right to work, and that all relevant employment legislation is strictly adhered to.

## Training

SETEC provides modern slavery and human trafficking E-learning to all employees of SETEC Consulting Engineers Ltd and all employees of SETEC INTERNATIONAL, SETEC NUCLEAIRE and SETEC TPI working on UK projects.

## Measuring effectiveness

SETEC periodically reviews its systems to ensure that it has robust policies and processes in place to mitigate the risk of modern slavery and human trafficking.

## Plans for the year to financial year January 2024

SETEC anticipates that the practical steps described above will also be taken in 2023. SETEC continues to be informed by the best practice and analysis of its sector, its clients, its suppliers and of anti-slavery practitioners.

SETEC is reviewing what more it can do to raise awareness of modern slavery both internally and externally. In 2022, SETEC has increased the number of modern slavery and human trafficking trained employees of SETEC INTERNATIONAL, SETEC NUCLEAIRE and SETEC TPI by extending the E-learning to all employees working on UK projects. SETEC has, also set up, HR policies and procedures.

SETEC has not had the opportunity to set up a modern slavery risk register in 2022 but plans to do so, during the course of 2023.

## Statement

This statement was approved by SETEC Consultants executive board. This statement will be reviewed annually and made available on our website.

***Anne-Marie CHOHO, Managing Director***

***Setec Consultants***



***Reviewed and revised: 1st of February 2023***

***Next review: 1st of December 2023***