Modern Slavery and Human Trafficking Statement

1 January 2024 – 31 December 2024

1. Purpose

This statement (the **Statement**) is made on behalf of BY Bâtiment International UK Limited which includes its Saudi Branch (together, **BYBATUK**) pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**).

BYBATUK is part of the Bouygues Group (hereinafter, **Bouygues**), a group of companies worldwide which have Bouygues SA, a CAC 40 company listed on the Paris Euronext, as their ultimate parent. Bouygues has around 201,500 employees worldwide and operates in 80 countries.

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 BYBATUK 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. BYBATUK's business and supply chain

As part of Saudi Arabia's "Vision 2030", Qiddiya Investment Company is developing an entertainment, sports and cultural destination in the Kingdom of Saudi Arabia. In this context, Bouygues was selected for the carrying out of certain works in relation to the Six Flags Theme Park project, located 30 km south-west of Riyadh. For the purpose of this project, a Joint Venture (the **JV**) was set up between BYBATUK (acting through its Saudi branch), its mother company BOUYGUES BÂTIMENT INTERNATIONAL (acting through its Saudi branch) and a local partner, ALMABANI GENERAL CONTRACTORS. BYBATUK was specifically established for this project and is not currently involved in any other projects.

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BYBATUK's 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;
- ***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

BYBATUK 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. A new group-wide Whistleblowing platform was implemented during 2022;
- ***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;
- ***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.

Together, all these documents constitute Bouygues and BYBATUK's ethics and compliance policy (the **Ethics and Compliance Policy**). It is accessible to all its employees of the JV.

Moreover, during the induction process, all new employees are introduced to the Ethics and Compliance Policy to make sure that every employee is fully informed about BYBATUK's standards and expectations regarding ethical conduct and compliance with company regulations. New employees are also required to sign a declaration acknowledging that they have received and understood all the relevant documents.

Bouygues' 'Speak Up' Campaign continues to run with a telephone hotline and an online platform for employees to report incidences of harassment, bullying or human rights violations 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

BYBATUK and its suppliers are expected to live up to and adhere to the principles set out in the Ethics and Compliance Policy and demonstrate progress towards the standards set out in it.

BYBATUK complies with Bouygues Construction's third-party integrity assessment procedure (the "**Procedure**"). This Procedure provides for compliance checks to be carried out on BYBATUK's third parties (including, but not limited to, suppliers, subcontractors, clients and partners) to ensure that they comply

with the laws and regulations in force. It also aims to identify any potential conflicts of interest and to ensure that they have not been subject to any sanctions or convictions. This Procedure ensures that any sanctions or convictions for modern slavery are quickly identified and immediately reported.

A prequalification questionnaire is sent to all subcontractors and suppliers to assess their adherence to health and safety regulations, quality standards, human rights practices, and financial audit requirements. This process ensures that our partners align with ethical and responsible business practices.

BYBATUK has entered into a framework agreement with a labour agency 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.

Regular on-site surveys are conducted to ensure strict compliance with labor laws and to prevent or remedy human rights violations. These surveys ensure that all employees on site retain their passports (not held by the labor agency), work under proper employment contracts, are provided with decent accommodation, and are not subject to forced labor/modern slavery.

Lastly, a dedicated labor committee, representing the workforce, is established to address concerns, advocate for fair treatment, and provide a direct channel of communication between employees and management.

5. Risk assessment and management

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

BYBATUK has in place appropriate processes for reporting concerns within the business, including a whistleblowing policy and a designated Compliance Referent (at BBI's level). BYBATUK's team of lawyers and Compliance Referent at BBI's level ensure compliance with all its legal and ethical obligations.

It is considered that subcontracting and the supply chain, as set out in Section 2 above, is an area of BYBATUK's business activities where there could be a higher risk of slavery or human trafficking taking place.

BYBATUK has a central procurement function that assesses and manages the procurement of high value and/or high-risk goods and services in accordance with BYBATUK's procurement practices and formal tendering procedures.

BYBATUK includes the Bouygues Corporate Social Responsibility Charter for Suppliers and Subcontractors, which contains anti-slavery provisions, in more of its contracts. 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 BYBATUK's effectiveness

BYBATUK 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.

Any potential concerns about incidents of Modern Slavery on the JV's site would be investigated internally and, where appropriate, reported to the relevant authority and/or local police. Appropriate risk assessments would be undertaken specific to the relevant concern.

7. Training in relation to slavery and human trafficking

By the end of 2023 BYBATUK had trained 219 staff members from the JV on ethics and compliance, with a focus on modern slavery highlighting how to spot the signs and how to report.

8. Conclusion

BYBATUK does not have a website on which this Statement can be published but a copy of this Statement is available in writing within 30 days to anyone who requests a copy, pursuant to section 54(7) of the Act.

This Statement was approved by the Board of BYBATUK on 28 June 2024.

Pierre Skorochod,
Director of BYBATUK

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