



Slavery and Human Trafficking Statement 2016

June 2017

1. Purpose

This statement (the “**Statement**”) is made on behalf of Bouygues E&S UK Limited and all its affiliated companies in the United Kingdom which include Bouygues E&S Contracting UK Limited, Bouygues E&S FM UK Limited and Bouygues E&S Infrastructure UK Limited (together, “**BYES**”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**).

BYES takes its obligations in relation to the identification, prevention and reporting of modern slavery and human trafficking very seriously and has a zero tolerance approach to the abuse of human rights. BYES 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 BYES has done in the financial year 1 January to 31 December 2016 to ensure 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

BYES’ activities in the UK include facilities management, design & build, energy performance contracting, infrastructure design and build, maintenance and related activities in the UK and Ireland to both public and private sector clients. BYES is part of a group of companies (the **Group**) worldwide which have Bouygues SA, a CAC 40 company listed on the Paris Euronext, as their ultimate parent. Bouygues group has over 120,000 employees worldwide and operates in 100 countries.

As a leading services provider, BYES has a complex supply chain model that both supports its core businesses and maintains its office and technology infrastructure. BYES supply chains relate mainly to the following activities:

- **Labour Supply** –the supply of permanent and temporary labour for service contracts
- **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) street lighting, 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 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 BYES’ core business; and
- **Travel** – mobility is essential and BYES works with a number of travel providers such as hotels and airlines.

3. Policies in relation to modern slavery and human trafficking

BYES 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:

- **Group 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;
- **Corporate Social Responsibility** policy – this policy specifically prohibits the use of child labour;
- **Health & Safety** policy – this policy sets out BYES’ 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 BYES’ 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 BYES’ 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** – BYES has a clear policy encouraging all its employees to report any concerns related to its direct activities, or its supply chains and which is made available to our supply chain and other business partners. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. BYES’ whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of censure, to an appropriate manager. Employees, customers or others who have concerns can also contact the Company Secretary at our head office. If that is not sufficient then the Group’s Ethics Officer based in Paris may be contacted for further advice and support.
- **Anti-slavery policy** – this policy specifically addresses the subject matter of the Act recognising and preventing trafficked, forced, bonded and child labour.
- **Corporate Social Responsibility Suppliers Charter (the Charter)** - the Charter is a contractual requirement, setting out the requirement that its suppliers cascade such obligations to their own suppliers. BYES uses pre-qualification questionnaire processes for suppliers which interrogate all sub-contractors, suppliers and consultants. 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. BYES works with suppliers to ensure that they meet the standards of the Charter. Serious violations of the Charter will lead to the termination of the business relationship

4. Due diligence processes

BYES 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.

BYES' procurement practices require that all new suppliers are subject to an appropriate level of screening. The scope of the screening BYES 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.

Further, the BYES' due diligence includes the following:

- 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;
- participating as a registered Business Partner in the "Stronger Together" campaign against modern slavery and human trafficking (<http://stronger2gether.org>);
- invoking sanctions against supply chain partners that fail to improve their performance or seriously violate our Charter, including the termination of the business relationship.

5. Risk assessment and management

Overall responsibility for the BYES' anti-slavery initiatives is held by the board and its directors. The board has delegated oversight and monitoring of corporate social responsibility and ethical matters to a sub-committee (the "**Ethics Committee**") composed of the Company Secretary, the Director of Human Resources and the Head of Legal. The Ethics Committee has the power to make recommendations to the board for the introduction or amendment of policies and practices to ensure the BYES' activities display the high expectations of ethical conduct.

Section 2 above sets out the areas of BYES' procurement activity where there could be a risk of slavery or human trafficking taking place.

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

BYES also employs a team of lawyers to ensure compliance with its legal and ethical obligations.

BYES 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 a whistleblowing policy and a designated Ethics Committee. A statement has been made by our Chairman to all staff asking all staff to be vigilant in our workplaces in respect of potential labour exploitation and to report anything giving rise to a suspicion in this area.

As a matter of best practice going forward, BYES will include model clauses on the Act in all of its contracts with suppliers, subcontractors and consultants requiring compliance with the Act permitting termination for breach.

6. Evaluating BYES' effectiveness

We have not found any evidence of practices that violate the Group Code of Ethics or Anti-slavery policy including the values that relate to modern slavery and human trafficking.

We have principles that assist decision making in the event of a breach of standards, for example a requirement to address any breach immediately and for a full investigation to follow. We are currently creating a more detailed process for addressing non-compliance.

7. Training in relation to slavery and human trafficking

BYES is developing a programme of slavery and human trafficking awareness training for its procurement team and the individuals in its business with responsibility for managing suppliers in medium to high risk areas.

The purpose of training will be to raise awareness of slavery and human trafficking as a problem that could potentially affect BYES' supply chain, provide assistance in identifying medium and high risk suppliers and behaviours and provide for detailed understanding of BYES' procedures in relation to medium and high risk suppliers.

BYES' policy is that all senior managers are required to undergo specific training concerning the Group's Code of Ethics and to sign a personal undertaking to abide by the Group's rules, known as the "Ethics & Compliance Statement".

BYES' will use its training of staff to raise general awareness of modern slavery issues by using internal communication tools and advising of on-line training available on its learning management system

8. Conclusion

This Statement was approved by the Board of Bouygues E&S UK Limited on behalf of BYES on June 21st 2017.

David Carr

Chief Executive Officer of Bouygues E&S UK Limited