

# Slavery and Human Trafficking Statement

25 July 2019

## 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 2018** 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 950 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 over 115,000 employees worldwide and operates in nearly 90 countries.

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.



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### 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 we fully respect our clients and collaborators, the environment and all our stakeholders and that through our actions we help 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 ensure 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; and
- **Anti-slavery policy** – this policy specifically addresses the subject matter of the Act recognising and preventing trafficked, forced, bonded and child labour.

### 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. Our PAS091 compliant pre-qualification protocol and Invitations to Tender now include questions about adherence with the Act and commitment to addressing modern slavery and human trafficking. Any applicant (to which the Act applies) which, for example, has not published the required s36 statement, will not pre-qualify for our supply chain as a result. The benefits of using further enhanced due diligence and auditing is also under consideration at the present time.

### 5. Risk assessment and management

It is considered that subcontracting, 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. This function has received specific awareness training on the issue of Modern Slavery to support in this risk assessment and management, particularly of subcontractors. They are currently undertaking a heat mapping exercise to provide further clarity on high risk subcontractors.

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

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. 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.

Bouygues now 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.

## **6. Evaluating Bouygues' effectiveness**

Bouygues recognises that some areas of Bouygues in the UK are exposed to parts of the industry that could be considered high risk and is committed to undertaking further developed due diligence of its supply chain over the coming year. 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 the last twelve months we have provided awareness training (as detailed in section 7 below) to both employees and the supply chain. We have also been able to provide intelligence to the law enforcement authorities as a result of our modern slavery awareness training.


As we continue on our modern slavery journey, we intend to continue our programme of awareness to employees and our supply chain, further progress our detailed risk mapping of the business and its supply chains and further develop our procurement auditing of the highest risk supply chain members.

## **7. Training in relation to slavery and human trafficking**

Bouygues has:

- continued to provide access to slavery and human trafficking awareness training for key individuals in its business;
- undertaken awareness training for all procurement and supply chain employees, highlighting how to spot the signs, how to report and Bouygues' policy on modern slavery;
- Developed a toolkit of materials and supporting communications for use on our 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 to be displayed on work sites 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 our sites to contact their line manager, Bouygues' dedicated modern slavery reporting mailbox or the relevant authorities so that the matter can be addressed. This will be rolled out onto all new sites during the coming year;
- During the 2018 financial year Bouygues also provided awareness training to new starters as part of the business induction process, which includes showing of the film "Concrete" (produced by Stronger2gether and the Chartered Institute of Building). An online awareness raising training module has been created and by the end of 2019 it is intended that all staff will have completed this; and



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- Continued to raise awareness of modern slavery and human trafficking with our supply chain, including the provision of training and e-learning via our partners the Supply Chain Sustainability School.

## 8. Conclusion

This Statement was approved by the Board of Bouygues (UK) Limited on behalf of Bouygues on 25 July 2019. 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**



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