

# Slavery and Human Trafficking Statement

August 2020

## 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 2019** to work towards ensuring that slavery and human trafficking is not taking place in any part of its businesses or supply chains. Its publication has been slightly delayed due to pressures of resourcing following the outbreak of the COVID-19 pandemic.

## 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 930 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 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;
- **Anti-slavery policy** – this policy specifically addresses the subject matter of the Act recognising and preventing trafficked, forced, bonded and child labour; 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.

### 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 (via our ConstructionLine registrations and verifications process) include questions about commitment to addressing modern slavery and human trafficking. Any applicant (to which the Act applies) which, for example, has not published the required s54 statement, will not pre-qualify for our supply chain as a result.





Bouygues will progress its modern slavery gap analysis and expand the risk profiling of its supply chain enabling us to detect and address any potential labour exploitation and human trafficking that may exist.

Bouygues intends to continue raising awareness of modern slavery and human trafficking with our supply chain by providing workshops and training via our partner 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.

Furthermore, Bouygues' Preferred Supplier Charter introduces the following sustainability requirements in order for any supply chain member to be considered as preferred:

- To comply with the Act and Bouygues' Modern Slavery policy;
- To commit to becoming a Supply Chain Sustainability School Bronze member by completing the confidential self-assessment and accessing a prioritised 10 point Action Plan with associated resources and thereafter working towards completing a re-assessment and gaining Silver membership status.

## **5. Risk assessment and management**

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

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.

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 previously received specific awareness training on the issue of Modern Slavery to support in this risk assessment and management, particularly of subcontractors. It is our intention to develop our heat mapping exercise to provide further clarity on high risk subcontractors over the next financial year.

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 our supply chain to comply with the terms of our Corporate Social Responsibility Charter for Suppliers and Subcontractors. By adopting this Charter, our supply chain undertakes to act in accordance with and implement all the principles it contains and to ensure that its own suppliers do likewise.

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

We recognise that some areas of Bouygues are exposed to parts of the industry that could be considered high risk and are committed to undertaking further developed due diligence of its supply chain. 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.

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:

- Trained 81% of Bouygues employees (including all new starters) via our online training module (as at the end of this financial year) highlighting how to spot the signs, how to report and Bouygues' policy on modern slavery; and
- Continued to develop 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 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.

## **8. Conclusion**

This Statement was approved by the Board of Bouygues (UK) Limited on behalf of Bouygues on 7<sup>th</sup> October 2020. 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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