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BYCN UK

Modern Slavery Act 2015: Anti-slavery and Human Trafficking policy

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1 Policy statement

- 1.1 Modern slavery is a crime (often an organised crime) and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Modern slavery is often hidden.
- 1.2 The company subscribes to the Bouygues SA [Code of Ethics](#). This requires employees of all Bouygues Group companies to behave with integrity, respect and responsibility including having respect for Human Rights and complying with health and safety requirements. Specifically, it requires all 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.
- 1.3 We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.4 This policy applies to the following subsidiaries of the Bouygues Construction group operating in the United Kingdom, namely:
Bouygues (U.K.) Limited;
BY Development Limited;
Bouygues Travaux Publics SAS (UK branch); and
VSL Systems (UK) Limited.
For the purposes of this policy, references to the **company** and **business** mean each of the above listed companies.
- 1.5 This policy also applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, consultants, sub-contractors and suppliers.
- 1.6 We prohibit modern slavery in all its forms and whether within the business itself or within its supply chains. Everyone to whom this policy applies should be clear that committing any form of physical or mental worker mistreatment, coercion, bullying or harassment is strictly prohibited both by law and as a

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matter of company policy. Accepting bribes or inducements to recruit or favour workers is also strictly prohibited as a matter of law and of company policy.

- 1.7 The cost of recruitment is a business cost and the Group will not allow any job finding fees to be paid by job applicants.
- 1.8 We shall comply with the employment and labour laws applicable in the United Kingdom (including those relating to living wages) and any other jurisdiction in which we operate.
- 1.9 Employees shall have freedom of movement and the right to enter into employment voluntarily and freely, without the threat of a penalty to salary. Employees shall also have the freedom to terminate their employment at any time without penalty, giving notice of reasonable length as required by their employment contract.
- 1.10. Employees are not required to lodge deposits or security payments at any time.
- 1.11. Employees are not prevented from leaving worksites, except for reasonable safety or security reasons.
- 1.12. Employees shall have freedom of association. We do not prohibit our employees from exercising their lawful rights to join trade unions. We do not tolerate intimidation or discrimination of any kind against union members or those advocating membership of a union. Our consultants, sub-contractors and suppliers are encouraged to recognise and support this right.
- 1.13. Child labour is prohibited.
- 1.14 We will not confiscate the original identification documents of any of our employees or workers.
- 1.15. All overtime is voluntary and is to be agreed by employees.
- 1.16. We will provide appropriate training to employees and workers to ensure that our staff understand the business' requirements and to ensure that anyone working on our sites is aware of the signs that modern slavery may be occurring and knows how to report it.
- 1.17. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors,

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suppliers and other business partners. As part of our contracting processes, we seek to require our contractors, suppliers and business partners to comply with requirements consistent with paragraphs 1.6 to 1.16 above and to require these standards of their own supply chains, require appropriate due diligence and controls to ensure modern slavery is not taking place in their own supply chains and also terms that require transparency from them in respect of their own approach to tackling modern slavery throughout their businesses and supply chains. We expect that our suppliers will hold their own suppliers to the same high standards and where they do not that they face appropriate sanctions

2 Responsibility for the policy

- 2.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2. The BYCN UK Compliance Referent, Kathryn Davies (Senior Legal Manager), has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3. Senior managers are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

3 Compliance with the policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3. If you have a concern that any form of modern slavery may be occurring on our sites or in our supply chains:
 - 3.3.1. You should notify the Site Manager of the relevant project should you have any concerns about the welfare of anyone working on our sites.

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3.3.2 You can report any suspicion of a conflict with or breach of this policy using our [Speak Up hotline](#)



or using the Bouygues Group whistleblowing platform, [BeSignal](#).

3.3.2. You can also notify BYCN UK's Compliance team directly (using the email modernslaveryreporting@bouygues-construction.com) if you believe or suspect that a conflict with or breach of this policy has occurred, or that it may occur in the future; and

3.3.3 If you suspect immediate danger you should contact the police.

3.4. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. To protect the suspected victim, you should be careful not to arouse suspicion of your concern with other workers on site (e.g. their direct supervisor), and not to approach the suspected victims and/or its potential aggressors directly.

3.5. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, ask for advice from the or Compliance Referent directly or email modernslaveryreporting@bouygues-construction.com or use the Safecall or BeSignal reporting platforms described paragraph 3.3.2 above.

3.6. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no-one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in

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any of our supply chains. If you are an employee, detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Our Whistleblowing Policy applies.

- 3.7. Where appropriate, and with the involvement of the Head of Legal (BYCN UK Legal Desk) or Compliance Referent, you should work proactively and collaboratively with enforcement authorities including the police and Gangmasters and Labour Abuse Authority to assist in crime prevention and prosecution.
- 3.8. We will always try to respond to any concerns raised about a suspicion of modern slavery in a timely manner. That notwithstanding, we will use our reasonable efforts to:
 - 3.8.1 acknowledge receipt of the concern within seven (7) days of receipt.
 - 3.8.2 commence investigations within five (5) days of the receipt of the concern.
 - 3.8.3 give feedback on outcome (if any) and the actions taken as a result of the investigation within a maximum of three (3) months. It should be noted that if the matter has been reported to the enforcement authorities, including the police and Gangmasters and Labour Abuse Authority, it is unlikely that we will be in a position to advise on the outcome of the concern.

4 Communication and awareness of this policy

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all new staff, and regular training will be provided as necessary to other members of staff.
- 4.2. We will provide more specific training to members of staff who work in areas of the business where there is the highest risk of modern slavery being encountered, such as those who work in procurement, site management, human resources and operations. The aim of training is to ensure a high level of understanding of the nature of modern slavery and the influence we are able to bring to ensure that it does not occur within any part of its own business and in any of our supply chains.

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- 4.3. We expect our contractors, suppliers and other business partners to provide similar training to their members of staff.
- 4.4. Our approach to modern slavery should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5 Breaches of this policy

- 5.1. Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct, depending on the circumstances.
- 5.2. In the case of a contractor, supplier or other business partner who breaches this policy, we may, depending on the facts and the terms of the contract with the relevant contractor, supplier or other business partner, terminate or suspend the relationship or otherwise cease, reduce or minimise business contact with the relevant contractor, supplier or other business partner or may require remediation measures to be undertaken.
- 5.3. In the event that we have a reasonable belief that modern slavery is occurring in any part of our business:
 - 5.3.1. we will:
 - 5.3.1.1. put in place remedial action as soon as reasonably practicable with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded and have access to justice and the appropriate remedy; and
 - 5.3.1.2. monitor the effectiveness of the remedial action taken including the actions taken to safeguard the victims.
- 5.4. In the event that we have a reasonable belief that modern slavery is occurring in the business or supply chains of any of contractors, suppliers and other business partners, we:
 - 5.4.1. will expect the relevant contractor, supplier or other business partner:
 - 5.4.1.1. to be fully transparent and supply such information as we may reasonably request in relation to the issue;

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- 5.4.1.2. to put in place remedial action as soon as reasonably practical with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded;
- 5.4.1.3. to monitor the effectiveness of the remedial action taken including the actions taken to safeguard the victims; and
- 5.4.1.4. to work with us as appropriate in the implementation of the remedial action and safeguarding and to report to us at reasonable intervals on the effectiveness of that remedial action and safeguarding and any further steps taken to ensure that such modern slavery ceases to occur.

6 Amendment to the policy

- 6.1. This policy expresses our commitment to the issues addressed. However, it does not in itself create any contractual obligations and may be amended by us at our discretion at any time.
- 6.2. The policy will be reviewed by the BYCN UK Board of Directors on a regular basis, usually at the same time as the board reviews our annual slavery and human trafficking statement.

Fabienne Viala

Country Chair

Bouygues Construction in the United Kingdom