Slavery and Human Trafficking Statement
January 2019 - December 2019

1. Purpose

This statement (the Statement) is made on behalf of Bouygues Travaux Publics, a French law "société par actions simplifiée", in respect of its business operations in the United Kingdom (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 to ensure that slavery and human trafficking is not taking place in any part of its businesses or supply chains. Its publishing is a little delayed due to resourcing pressures as a result of the COVID 19 pandemic.

2. Bouygues’ structure, business and supply chain

Bouygues is a provider of design and construction services to public sector clients in the United Kingdom. It currently trades as member of an integrated unincorporated joint-venture, named Bylor, together with Laing O’Rourke Construction Limited, in relation to the Hinkley Point C Power Station project, and as a member of an integrated unincorporated joint-venture, named Align, with the companies VolkerFitzpatrick Limited and Sir Robert McAlpine Limited, in relation to the High Speed 2 Phase 1 project. Bouygues has around 365 direct employees in the UK. Bouygues’ operations 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 design 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, either externally or from other companies within the Bouygues group, 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, engineering (such as structural, system, civil and mechanical and electrical), geological and geotechnical, architectural, sustainability, 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 service provider which manages its transportation and accommodation bookings.

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 Declaration 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;

- **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 workplace;

- **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; and

- **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

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. Each of the two joint ventures in which Bouygues
participates involve agreements with supply chain members which pass down obligations contained in the main contract with the relevant client and require Bouygues to comply with English legislation and corporate social responsibility regulation, including the Act, together with other United Nations, European, International Labour Organisation, or Ethical Trading Initiative Base Code principles/requirements which include provisions relating to child labour and forced or obligatory labour.

Bouygues intends to undertake a modern slavery gap analysis and risk profiling of its supply chain enabling us to detect and address any potential labour exploitation and human trafficking that may exist.

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 both sets up a project-by-project procurement team dealing with project specific, high value and/or high risk goods and services and otherwise relies on a central procurement function that assesses and manages the procurement of high volume and/or standard goods and services in accordance with Bouygues’ procurement practices and formal tendering procedures.

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 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 includes clauses on the Act in all of its contracts with suppliers, subcontractors and consultants requiring compliance with the obligations contained in its main contracts (which therefore includes compliance with the Act and the other principles/requirements identified in section 4 above) and requiring corresponding terms be applied to the continuing supply chain.

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 due diligence of its supply chain. To date, Bouygues has not found any evidence of practices that violate the Act. The business remains committed to developing its policies and processes to ensure that any instance of modern slavery or human trafficking is identified and resolved in the best interests of the victim.

We intend to continue our programme of awareness to employee and our supply chain and undertake a detailed risk mapping of the business and its supply chains and develop our procurement auditing of the highest risk supply chain members over the coming year.

7.  Training in relation to slavery and human trafficking

Bouygues has:
- Prepared modern slavery and human trafficking awareness training for its employees, including all procurement and supply chain employees, highlighting how to spot the signs, how to report and
Bouygues’s policy on modern slavery. 67% of staff completed this training during 2019; 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 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.

8. **Conclusion**

This Statement was approved by the *Comité de Direction* of Bouygues on behalf of Bouygues on **July 9th**
2020.

Philippe Amequin,
*Directeur Général* of Bouygues Travaux Publics