



# Slavery and Human Trafficking Statement

January 2022 - December 2022

## 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. 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 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 2022** to work towards 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

Bouygues is a provider of design and construction services to public sector and private 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 1000 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 220,000 employees worldwide and operates in nearly 80 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;

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- **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 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. The Code updated in 2022;
- **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 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. This policy was updated in 2022;
- **Anti-slavery policy** – this policy specifically addresses the subject matter of the Act recognising and preventing trafficked, forced, bonded and child labour.

These policies are available on the Bouygues' internal management systems accessible to all employees.

In addition, policies specific to the joint ventures may also apply, for example policies relating to Recruitment, Human Resources / Grievances, management of the supply chains and worker handbooks and/or trade union standards.

Bouygues supports a 'Speak Up' campaign, whereby an independent partner providing a telephone hotline and an online platform is available for employees to confidentially and anonymously report incidences of



harassment and bullying. This ensures that those at risk and who may not have immediate access to email can report any concerns on a timely basis.

In addition, the Align joint venture has implemented a smartphone application and online platform available to all the Align joint venture staff, workers and members of the supply chain enabling them to submit a positive or negative report about the practices of the joint venture as they relate to environment, health, safety, security, quality and mental health/wellbeing. A 'Speak Up' campaign for Ethics and Compliance concerns including suspicions of modern slavery or poor labour practices is now provided by an independent third-party provider, also by way of telephone hotline and online platform, and available to all joint venture staff, workers and members of the supply chain. This is supported by a project Ethics and Compliance Officer. The Align joint venture has a dedicated Modern Slavery Policy which is communicated to the supply chain. Awareness posters are also located around the site.

The Blyor joint venture staff and supply chain continue to have access to the independent 'Speak Up' hotline and platform provided to all participants on the Hinkley Point C Nuclear Power Station project. Communications and campaigns supporting the prevention of discrimination, harassment, bullying and victimisation in the workplace are implemented from time to time as the business considers necessary.

#### **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' direct 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. Bouygues' pre-qualification protocol and Invitations to Tender (via ConstructionLine, CHAS and Achilles registrations and verifications process) include questions about commitment to addressing modern slavery and human trafficking. Prospective members of the supply chain may also be asked questions on skills, education & employment, equality, diversity and inclusion, as well as on industrial relations and whether they allow their workforce to join trade unions. 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. Trade unions are involved in both projects and in some instances, for example with respect to pay and working conditions for the Hinkley project, subcontractors and suppliers as well as direct employees benefit from the industrial relations agreements settled. Neither joint venture prevents their employees from joining a trade union. Supply chain members may also benefit from contractual obligations on equality, diversity and inclusion.

On the Align joint venture, recruitment of labour by the joint venture is focused through three agencies. As part of the procurement of these agencies, the Align joint venture ensured that the chosen agencies were paying in accordance with the London living wage, complying with the working rules agreement and



the right taxes were being deducted. Pursuant to their contractual obligations, the labour agencies are required to conduct all the applicable 'right to work' checks and ensure that all legislation applicable to the workers are complied with. The labour agencies are also required to comply with a Modern Slavery policy. The framework agreement authorises the joint venture to conduct audits to ensure, among other things, that the labour agencies are conducting all the applicable screenings to ensure that the workers they provide are not victims of modern slavery.

The BYLOR joint venture engages its labour workforce (approximately 4,800 in 2022) using a service company, BYLOR Services Limited, which has issued its own Modern Slavery Statement. The BYLOR joint venture may occasionally enter into temporary labour-only subcontracts to meet peaks in demand for particular areas of the project.

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

It is considered that subcontracting, as set out in Section 2, above is a key area of Bouygues' business activities where there could be a higher risk of slavery or human trafficking taking place.

Bouygues relies on specialist procurement teams operating locally, supported as appropriate by a central procurement function in accordance with clearly mandated procurement practices and formal tendering procedures.

Bouygues also employs a team of lawyers and has ethics and 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. In addition, Bouygues has a Modern Slavery Working Group comprising senior members of its key business operations, across the Bouygues Group's entities in the United Kingdom, tasked with identification of areas of improvement of current methods of tackling modern slavery, assisting in the risk management of its supply chain and in the implementation of strategies and reporting.


In addition, the Align joint venture has an Equality, Diversity & Inclusion Manager as part of its HR team whose remit also includes implementing relevant checks and balances to minimize the risk of modern slavery occurring on the project. Further, during 2022 the Align joint venture carried out risk assessments and heat-mapping of the supply chain and consequently completed 10 audits of targeted suppliers, in particular labour providers, catering and cleaning suppliers (including 2 audits in partnership with the GLAA).

Bouygues includes clauses in its contracts with suppliers, subcontractors and consultants requiring compliance with the obligations contained in its main contracts (which may therefore include 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. As a minimum, all subcontract and supply contracts require compliance with English law.

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

Bouygues considers that it is a responsible employer and main contractor and that it has effective processes in place for management of the risk of modern slavery occurring on the sites it is in control of.

Nevertheless, Bouygues recognises that some areas of its operations, in particular some areas of the supply chain, are exposed to parts of the industry that could be considered high risk and recognises that



in order to further mitigate the risk of modern slavery some further development of risk assessments and mapping of its supply chain could be beneficial in some areas of the business, together with on-site reviews of higher risk operations. Collaboration with the GLAA by the Align joint venture was found to be positive and effective.

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.

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

In 2022 Bouygues:

- Trained over 77% of its new starter employees as part of their induction via its online training module highlighting how to spot the signs, how to report and Bouygues' policy on modern slavery.
- The Align joint venture workforce receive in-person training as part of their induction, staff are required complete an online mandatory modern slavery training course and periodic toolbox talks are delivered by supervisors.
- Has available a toolkit of materials and supporting communications for use on its 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 the Bouygues sites to contact their line manager, Bouygues' dedicated modern slavery reporting mailbox, the 'Speak Up' hotlines/online platforms or the relevant authorities so that the matter can be addressed.

## **8. Conclusion**

This Statement was approved by the Executive Committee of Bouygues on behalf of Bouygues Travaux Publics (UK branch) on 28 June 2023.



**Bertrand Burtschell,**  
*Directeur Général of Bouygues Travaux Publics*