

## **MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT**

Soletanche Bachy SA is a global specialist foundation contracting organization conducting activities through local subsidiaries organized into geographical zones. Bachy Soletanche Ltd., McDonnell Piling Ltd, Menard Ltd and Soil Engineering Geoservices Ltd. are subsidiaries (known as Business Units or BU's) operating within the Soletanche Bachy UK Zone (SBUKZ) of specialist geotechnical contractors carrying out ground investigation, foundation, and specialist geotechnical work for the construction industry.

The purpose of the Modern Slavery and Human Trafficking Policy is to communicate to our employees, customers, suppliers, shareholders, and the communities we serve, our commitment to combatting modern slavery in the construction industry.

The SBUKZ is also part of the VINCI Group of companies, one of the largest global built environment organisations. Being part of the same group lends itself to collaborative working, following similar procedures and having access to a global resource in terms of people, equipment, technology, and common suppliers.

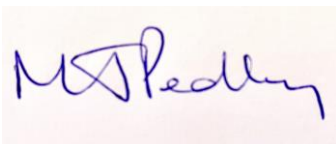
We are dedicated to ensuring there is transparency in our business and in our approach to combatting modern slavery in all our operations. We expect the same high standards from all our subcontractors and suppliers.

Our policy draws upon the VINCI Group's code of ethics and conduct (the "Code"), which underpins our strong values on corporate culture and guide our activities.

### **1. THE MODERN SLAVERY ACT 2015**

- The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom. It is designed to tackle slavery in the UK and consolidates previous offences relating to trafficking and slavery. The act extends to England and Wales.
- Section 54 of the UK's Modern Slavery Act 2015 is the transparency in supply chains provision. It requires commercial organisations operating in the UK, with an annual turnover of £36 million or more, to prepare an annual statement on the steps the SBUKZ has taken, if any, to ensure slavery and human trafficking is not happening in its own business and supply chains. The statement must be approved by the board of directors (or equivalent management body) and signed by a director (or equivalent) and published on the homepage of the website of the commercial organisation (or a link on the homepage to the statement must be provided).
- More than 49.6 million people are estimated to be entrapped in modern slavery across the world and an estimated 100,000 victims in the UK in 2020. They are deprived of their freedom for the personal or financial gain of their exploiter.
- Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. Modern Slavery can take many forms the most common being domestic servitude, sex trafficking, forced labour, bonded labour, child labour and forced marriage.

**Approved by: Martin Pedley**



**(UK Zone Director)**

- We fully support the government's objective to eradicate modern slavery and human trafficking. To that end we are signatories to the Gangmasters & Labour Abuse Authority, Construction Protocol.

## 2. ORGANISATIONAL POLICIES

- BU policies are developed with the support of the Board of Directors and relevant senior management. SBUKZ Policies are approved by the UK Zone Managing Director.
- This policy applies to all employees, subcontractors, and suppliers. Compliance is mandatory.
- This policy does not form part of any employee's contract of employment. We may amend it at any time.
- A Supplier code of conduct and an Ethical Procurement Policy have been developed to strengthen our commitment and focus.
- Breaches of policy by employees may result in disciplinary action and in the case of suppliers and subcontractors, may result in contract termination.

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## 3. RESPONSIBILITIES

- This policy is governed by the board of directors with full support. Strong involvement and input are provided from the UK Zone Ethics and Social Alignment Group, Procurement and Human Resources.
- It is management's responsibility to:
  - .1. communicate the expected standards to our employees and ensure that they conduct themselves in an appropriate manner.
  - .2. ensuring that efforts are made to investigate & remediate the risk of modern slavery in the business and/or supply chains.
- Prevention, detection and reporting of modern slavery is the responsibility of our employees, our subcontractors, and our suppliers. All employees, subcontractors and suppliers are required to avoid any activity which might suggest or lead to a breach of this policy.
- If you suspect modern slavery is taking place, have any suspicions or are aware of any breaches to the policy please speak to a member of HR in confidence. Please also refer to the Whistleblowing directive that is within the staff handbook.
- This policy shall be reviewed on an annual basis and as and when necessary to reflect changes in relevant legislation.
- You are invited to comment on this policy and suggest ways in which it might be improved.

## 4. TRAINING AND AWARENESS

- SBUKZ undertakes to ensure that its Modern Slavery and Human Trafficking Policy and those policies which derive from it are communicated effectively to directors, management, employees, subcontractors and suppliers via email, Inductions, noticeboards, staff handbook and toolbox talks.
- Training is a fundamental way of raising awareness and ensuring that employees, subcontractors, and suppliers understand the importance of tackling modern slavery. Training will be provided in a priority order of High to low risk.
- An e-learning module is available to all staff and a link has been sent to the supply chain.
- The e-learning module will reference, among many things, how all parts of the business can influence purchasing practices which can influence supply chain conditions. A record will be kept on whom has

completed the module. It will also reinforce what is ethically right to help encourage employee's values, beliefs, and attitudes.

- Guidance is also available from the CIPS website for procurement and the Sustainability Supply Chain School.
- Annual toolbox talks and new articles are circulated to keep the issue present and to inform our colleague of relevant changes in the industry regarding Modern Slavery.

## **5. EMPLOYMENT**

- The SBUKZ expects every one of its employees to demonstrate exemplary conduct based on integrity, fairness, and respect.
- All staff must refrain from behaviour that could involve themselves, other employees, or the group in illegal or unfair practices.
- We aim to ensure that job requirements and job selection criteria are clear and based only what is required to get the job done effectively. We will avoid making stereotypical assumptions based on protected characteristics about who is able to do a particular job. We focus on the skills and competences required to carry out the role successfully.
- We aim to ensure that no job applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage protected groups, and which are not justified by the demands of the job.

## **6. SUPPLY CHAIN & DUE DILIGENCE**

- We are committed to working in partnership with our supply chain to tackle modern slavery and human trafficking, and to promoting Ethical and sustainable procurement throughout the SBUKZ and the supply chain.
- We expect our supply chain to ensure the products they source comply with ethical standards and that they can offer full transparency.
- High risk tier one suppliers will be highlighted from the heat mapping / risk analysis, a strategy will then be formalised as to how and when auditing and further checks are carried out on these supply chain members.
- We are also committed to producing a guidance booklet to help all stakeholders understand what is required of them and what help and support can be provided.
- A Supplier code of conduct and an Ethical Procurement Policy have been developed to strengthen our commitment and focus.
- Our procurement team members are Chartered Institute of Procurement & Supply (CIPS) members or actively working toward membership. As CIPS members they are committed to a code of conduct which includes requirements associated with Modern Slavery.
- Our standard Terms & conditions includes a clause on Modern Slavery.
- All suppliers are pre-approved before using, we request their Modern Slavery Policy and monitor their performance via our procurement feedback mechanisms.

## **7. WHISTLEBLOWING**

- SBUKZ has a Whistle Blowing Policy which should be read alongside this policy.
- SBUKZ believe that good communication amongst workers at all levels promotes better business practice and we will not tolerate wrongdoing by workers at any level.

- If a worker has a serious concern the matter can be reported, without fear of reprisals.
- The purpose of this procedure is to enable the SBUKZ to investigate and deal properly and sensitively with allegations of wrongdoing, unsafe working environment, or practices, raised by workers.

## **8. POLICY REVIEW AND ACCESS**

- In line with Section 54 of the Modern Slavery Act 2015 this policy is reviewed to ensure the SBUKZ fulfils its applicable legal obligations.
- This policy is made available to anyone who wishes to obtain a copy via our website. The policy is also made available to interested parties upon written request. A copy of the policy shall be sent to the interested party within 30 days or receipt of the request.
- This policy, which is reviewed annually, is communicated to all employees and persons working on our behalf, is displayed at all our offices and sites, and is made publicly available to interested parties via our websites.