



WE OPEN THE WAY

## Modern Slavery & Human Trafficking Statement 2021

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015, and sets out the steps that Colas Limited has taken to ensure that slavery and human trafficking are not taking place in any part of our business or in our supply chains.

This statement constitutes our slavery and human trafficking statement for the financial year ended 31st December 2020.

### CEO's Statement

At Colas Limited we take pride in conducting our business responsibly and to the highest ethical standards. The observance of ethics and integrity have been an integral management principle throughout Colas Limited for many years. The Code of Ethics of Bouygues Group (Colas Limited's parent company) govern our activities, our values and the way we work.

This statement demonstrates how we apply our ethical standards in practice and reflects our continued commitment to prevent modern slavery and to ensure that the use of forced, trafficked or child labour it is not occurring anywhere in our organisation and our supply chain.

### Our Organisational Structure and Supply Chains

Colas Limited operates in the UK delivering sustainable transport infrastructure solutions across many of the public and private sectors. We have approximately 1,500 employees in the UK working out of more than 20 locations.

Colas Limited has a vetted tiered national supply chain that includes enterprises of all sizes, ranging from national companies to SMEs and micro-organisations, providing a range of goods and services both within the UK and internationally. Our supply chain is engaged via individual orders, framework contracts and subcontract agreements. In all instances, it is expected that Colas Limited and its supply chain members will strive to apply the principles of good collaborative ethical working. Colas Limited uses the Constructionline system as its preferred supply chain on-boarding process and takes into account supply chain responses and actions in relation to modern slavery.

Colas Limited is part of the Colas Group which operates in over 50 countries across Europe, Africa, America, Asia and Oceania. The Colas Group operates in three cornerstone business segments: Roads (road construction and maintenance), Materials (production and recycling of construction materials, mainly aggregates and bitumen) and Railways. The Group is also present in Water and Energy Transport.

The Colas Group is in turn part of Bouygues, an international diversified services Group operating in over 80 countries in construction (Bouygues Construction, Bouygues Immobilier, Colas), media (TF1) and the telecoms (Bouygues Telecom) sector.

### Our Policies

Colas Limited Modern Slavery Policy sets out our commitment to implementing and enforcing effective systems and controls to ensure that modern slavery is not occurring anywhere in our business or supply chains, and stipulates that Colas Limited expects the same high standards to be adopted by all of its contractors, suppliers and other business partners. The Directors of Colas Limited accept overall responsibility for ensuring that all parties under Colas Limited control comply with the Policy. Primary responsibility for implementing the Policy lies with our Company Secretary, who is Colas Limited's designated Ethics Officer, and who works closely with the human resources and procurement teams and other relevant parts of the business.



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Colas Limited's Ethics Policy includes a stated commitment to maintaining an honest and open environment in relation to all aspects of the company's operations, and transparency across activities within any part of the company's business or its supply chain to promote confidence between Colas Limited and its stakeholders. The Ethics Policy also encourages employees to report concerns in accordance with the company Whistleblowing Policy.

Colas Limited's Whistleblowing Policy (published on our intranet, and cross-referenced in our Modern Slavery Policy) stipulates that every Colas Limited employee has a responsibility to speak out if, acting in good faith, they reasonably suspect malpractice within the company. Colas Limited is also committed to ensuring that no employee suffers any detrimental treatment as result of reporting in good faith a concern about any wrongdoing or breaches of law, including any suspicion that modern slavery of whatever form may be taking place in any part of Colas Limited's business or supply chain.

Colas Limited's Ethics Policy also reminds employees that they are expected to perform their duties in accordance with Group principles. The Group Code of Ethics states that the principle of respect for persons shall be a key principle governing the actions of employees, requiring mutual respect, trust and dignity to be observed, including compliance with the principles of the UN's Universal Declaration of Human Rights and with the fundamental conventions of the International Labour Organisation in particular concerning forced and child labour.

### **Our Due Diligence in Relation to Slavery and Human Trafficking**

The Colas Group has also introduced an enhanced requirement for Group companies to implement a vigilance plan to satisfy the duty of vigilance under French law to report on mechanisms in place to prevent human rights violations and environmental impacts throughout the Group and their supply chain. This requirement will reinforce and compliment the measures taken by Colas Limited to satisfy the requirements of the Modern Slavery Act 2015.

### **Our Risk Assessment and Management:**

In maintaining our Approved Supplier List of subcontractors and material suppliers, Colas Limited's procurement team works in conjunction with the supply chain pre-qualification systems of the Constructionline procurement and supply chain management scheme, which addresses within its integral audit acceptance procedures checks on the steps taken by approved suppliers to ensure that slavery and human trafficking is not present in their business or supply chain.

Over the course of 2020 and continuing into 2021 Constructionline has continued to update its questions in relation to modern slavery in response to the evolution of this topic (the questions being based on a common requirement set by the UK Government (PAS 91 / Build UK)). In previous years Colas Limited has worked with Constructionline with regard to review and enhancement of the questions used in the Constructionline checks. Colas Limited has also been discussing with Constructionline the potential for developing a bespoke periodic report to fully detail the up to date position of Colas Limited's supply chain. Thus, Colas Limited is actively contributing to supporting improved mechanisms for the benefit of the construction industry as a whole.

For subcontractors or material suppliers seeking to be included on our Approved Supplier List, who do not want to sign up to be approved by Constructionline, Colas Limited uses its own Supplier Evaluation Questionnaire, which includes the same requirement for suppliers to verify the steps they have taken to ensure that slavery and human trafficking is not present in their business or supply chain. Colas Limited is regularly amending its own Questionnaire (based on PAS 91) to reflect changes in all areas including regarding modern slavery, and as part of Colas Limited's consolidation plan with its supply chain, Colas Limited is taking into account supply chain responses and actions in relation to modern slavery.



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Colas Limited's expectations regarding supply chain behaviour are also being reinforced through distribution of our Modern Slavery Policy to our suppliers and subcontractors, in conjunction with a reminder of that compliance with our Policy is a prerequisite to working with Colas Limited.

Modern Slavery Act awareness is a standing agenda item and an area of particular focus in meetings between the Colas Limited procurement team and our suppliers. In addition, Colas Limited supplier workshops were held for the purposes of the company's 'Be Fair' initiative. The workshops focussed on engagement of subcontract labour and included a module on Modern Slavery Act requirements.

We seek to impose, in Colas Limited's standard terms and conditions, contractual terms on our supply chain asking them to confirm that they and their supply chain are in full compliance with the Modern Slavery Act requirements.

New communication channels have been created that can be used to relay information regarding combatting modern slavery, including regular company publications. Colas Limited is also using its annual Global Safety Week as an event to promote actions to counter the risk of modern slavery, including highlighting pointers for those working in the construction industry to look out for, recognising that this is considered to be a high risk sector for labour exploitation.

Our assessment as to where there is increased risk of potential contravention of Modern Slavery Act requirements identifies that a particular area of focus should be where relatively low skilled operatives are engaged through subcontract arrangements in the operational business. We shall be taking additional steps to raise awareness in such parts of the business. We also liaise with goods and materials suppliers that we have assessed as being most at risk, to verify the checks they undertake on their supply chain.

These measures are subject to ongoing review and additional measures will be developed and implemented as appropriate, with relevant performance indicators to measure effectiveness in ensuring that slavery and human trafficking is not present in the Colas Limited business or our supply chain.

### **Staff Training on Slavery and Human Trafficking**

Modern Slavery Act requirements have been reflected in the company's Ethics and Compliance Programmes during 2018, 2019, 2020 and continuing into 2021. Training delivered by the Company Secretary to Colas Limited managers around the country, and to the company's Operatives' Forum, has included a module on the Modern Slavery Act for dissemination to employees around the company, and discussion of the requirements of the Group Code of Ethics.

Colas Limited's Modern Slavery Policy and Statement are published on our corporate website and are also available to company employees on the Colas Limited intranet and forms part of e-learning induction for all new employees in Colas Limited.

Since 2017, Colas Limited has held a 'Be Fair' accreditation, the fundamental concept of which is to create an inclusive environment where people feel respected and are comfortable in raising issues. The 'Be Fair' mechanisms for raising concerns, such as anonymous texting services and grievance procedure, work in tandem with options under our Whistleblowing Policy, and strengthen the structure within Colas Limited for alerting of issues applicable to modern slavery. Be Fair representatives, across the business assist Colas Limited in promoting inclusion and respect and upholding our Fairness, Inclusion and Respect policy on site, whilst also acting as a focal point for employees wishing to raise any issues. The Be Fair representatives, who formerly met on a quarterly basis, now meet each month to ensure we maintain momentum in progressing actions against our EDI targets.

Colas Limited's recruitment and selection processes address modern slavery issues in the context of assessment of right to live and work, identity checks (including ensuring that employees can provide evidence that they are in possession of their own identification documents), and verification of references for permanent and temporary staff.



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Colas Limited's compliance with relevant employer obligations, such as regulations governing minimum and living wage, gender pay gap reporting and pension automatic enrolment duties, serve to underpin the steps we are taking to ensure modern slavery is not present in our business.

A more focussed training programme is under development for key functions within Colas Limited to build on existing materials and improve awareness on aspects specific to those functions, such training to be mandatory for those involved in human resources and procurement, and to include participation of Colas Limited's labour provider supply chain.

In 2021 Colas Limited has committed to strengthening its review and risk assessment process for the potential for slavery or human trafficking in the organisation and its supply chains. A more stringent checking and reporting procedure of anti-slavery clauses in contracts with suppliers is under development together with the creation of additional anti-slavery checking procedures.

**Chief Executive Officer**  
C. Fergusson

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April 2021