

# Modern Slavery & Human Trafficking Statement 2017



This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015, and sets out the steps that Colas Limited (the Company, or “we”) 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 31<sup>st</sup> December 2017.

## CEO’s Statement

At Colas we take Pride in conducting our business responsibly and to the highest ethical standards. We recognise that modern slavery, in its various forms, causes suffering to communities and individuals globally. We fully accept our moral as well as legal obligation to prevent modern slavery, and to ensure that it is not occurring anywhere in our business or supply chains.

## Our Organisation

Colas Limited operates nationally in the transport infrastructure sectors, delivering sustainable solutions for design, building and maintenance of the UK’s transport infrastructure. The Company has over 1,500 employees in the UK working out of more than 25 locations, and has been involved with the UK’s highways since the 1920s. Colas Limited is part of the International Colas Group, one of the world’s leading road construction and maintenance organisations.

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 us with 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 and its supply chain member will both strive to apply the principles of good collaborative ethical working.

## Our Policies

Colas’ 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 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 under Colas’ 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.

Colas’ Whistleblowing Policy (published on our intranet, and cross-referenced in our Modern Slavery Policy) stipulates that every Colas employee has a responsibility to speak out if, acting in good faith, they reasonably suspect malpractice within the company. Colas 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’ business or supply chain.

## What we are doing


Colas’ initial and ongoing steps to ensure no modern slavery in any of its forms is present within Colas’ own business or its supply chains include the following.

1. Colas’ Modern Slavery Policy and Statement are published on our corporate website, and are also available to company employees on the Colas intranet.

2. Modern Slavery Act requirements are reflected in the company's current Ethics Awareness Programme. Ethics Awareness Training delivered by the Company Secretary to Colas managers around the country during 2016 and 2017 includes a module on the Modern Slavery Act, which has been discussed for dissemination to employees around the company.
3. In maintaining our Approved Supplier List of subcontractors and material suppliers delivering to site, Colas' 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.
4. For subcontractors or material suppliers seeking to be included on our Approved Supplier List, who do not to sign up to be approved by Constructionline, Colas 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.
5. Colas' 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.
6. At the end of 2017, Colas achieved '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 for alerting of issues applicable to modern slavery.
7. Modern Slavery Act awareness is an agenda item of particular focus in meetings between the Colas procurement team and our suppliers. In addition, Colas supplier workshops were held throughout 2017 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.
8. Colas' recruitment and selection processes address modern slavery issues in the context of assessment of right to live and work, identity checks, and verification of references. Hiring of temporary staff is identified as an area for ongoing focus in recruitment.
9. Colas' compliance with relevant employer obligations, such as regulations governing minimum and living wage, and pension automatic enrolment duties, serve to underpin the steps we are taking to ensure modern slavery is not present in our business.
10. A more focussed training programme is under development for key functions within Colas 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' labour provider supply chain.
11. We seek to impose 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.
12. These measures are subject to ongoing review and additional measures, including relevant performance indicators, will be developed and implemented as appropriate .

This statement was approved by the board of directors of Colas Limited on 18<sup>th</sup> April 2018.

Chief Executive Officer



C. Fergusson  
Sept. 2018