

Modern Slavery & Human Trafficking Statement 2018



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 31st December 2018.

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 investment, design, construction, maintenance and operation of the UK’s transport infrastructure, working on a wide variety of projects for public and private sector clients. The Company has approximately 1,500 employees in the UK working out of more than 20 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 with renowned research and development facilities, and the Colas Group is in turn part of and governed by the ethics rules of the international Bouygues Group.

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 members will both strive to apply the principles of good collaborative ethical working. Colas uses the Constructionline system as its preferred supply chain on-boarding process, and as part of Colas’ consolidation plan with its supply chain, Colas takes into account supply chain responses and actions in relation to modern slavery.

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’ 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 and its stakeholders. The Ethics Policy also encourages employees to report concerns in accordance with the company Whistleblowing Policy.

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.

Colas' 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.

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 to satisfy the requirements of the Modern Slavery Act 2015.

What we are doing

Colas' 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 have been reflected in the company's Ethics and Compliance Programmes during 2016, 2017 and 2018. Training delivered by the Company Secretary to Colas 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.
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. Over the course of 2018 (and continuing into 2019) 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)), and Colas has been working with Constructionline with regard to review and enhancement of the questions used in the Constructionline checks. Colas has also been discussing with Constructionline the potential for developing a bespoke periodic report to fully detail the up to date position of Colas' supply chain. Thus Colas is actively contributing to supporting improved mechanisms for the benefit of the construction industry as a whole.
5. 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. Colas 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' consolidation plan with its supply chain, Colas is taking into account supply chain responses and actions in relation to modern slavery.
6. 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.

7. Since 2017, Colas has held '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. Be Fair Representatives, across the business assist Colas 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 meet on a quarterly basis.
8. Modern Slavery Act awareness is a standing agenda item and an area 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.
9. Colas' 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. The use of contingent and agency labour is being further reviewed in 2019.
10. Colas' 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.
11. 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.
12. We seek to impose, in Colas' 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.
13. New communication channels have been created that can be used to relay information regarding combatting modern slavery, including regular company publications. Colas 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.
14. Creation of a cross-departmental working group to lead company activities on modern slavery work, recognising the importance of a multi-disciplinary approach, including representation from key supply areas that have been identified as being at particular risk of potential impact of modern slavery.
15. 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 gangs 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.
16. 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 business or our supply chain.

This statement was approved by the board of directors of Colas Limited on 20th June 2019.

Chief Executive Officer



C. Fergusson
June. 2019