



# Modern Slavery Act Compliance Statement

## Introduction

The Modern Slavery Act 2015 (the "Act") mandates that Colas Rail Ltd. ("Colas Rail") prepares a slavery and human trafficking statement for each financial year.

Slavery and human trafficking, in their various forms and guises, are crimes in the United Kingdom and in much of the world, yet regrettably, they continue to exist. Many businesses unintentionally encourage slavery and human trafficking through the procurement of products and services from their supply chain, which have been sourced, manufactured and secured without recognition of the conditions under which individuals have been forced to deliver.

## Acknowledgment and Commitment

Colas Rail is a market leading railway infrastructure services business that promotes and upholds the highest standards of ethical conduct and it expects its supply chain to commit to the same. Colas Rail is dedicated to operating in a business environment free from slavery and human trafficking; yet it recognises that its truly diverse business and international supply chain are at risk of facilitating such crimes.

Colas Rail is part of the Colas Group, a global leader in infrastructure construction and maintenance, which in turn is part of the French multi-national Bouygues Group. The railway division is one of the world's leading providers of rail infrastructure services. In the UK, Colas Rail combines the engineering skills of all our specialist businesses to provide total solutions in all aspects of railway infrastructure, from high-speed rail systems to light and urban rail. Colas Rail is also a national freight operator. It offers a full range of services, supported by a 24-hour control centre based at Rugby. The company's head office is based in the heart of London with depots at Rugby, Crewe, Bristol, Manchester and Plymouth.

## Organisation's Structure

Colas Rail employs over 1200 staff and its business is split into 3 divisions:

- **Infrastructure** undertakes all railway construction, maintenance and design and survey activities for Network Rail
- **Services** consists of our Freight activities and Plant activities such as On-Track Machines, Rail Grinding services and Strategic plant services
- **Urban** is dedicated to urban rail construction and maintenance.

## Policies & Due Diligence on Slavery and Human Trafficking

Colas Rail is committed to ensuring that it is taking the necessary steps to ensure that there is no modern slavery present in its business and supply chain. As part of the wider Bouygues Group, Colas Rail continues to subscribe to the Group's Code of Ethics and seeks to comply with the principles of the UN Global Compact, the UN Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation. The Group's Code of Ethics is readily available to all staff.





The Group Code of Ethics has recently been revised and the Group's Whistleblowing policy, part of the Code, now explicitly covers human rights abuses.

The Group Code of Ethics is cascaded down to Colas Rail and the requirements of the Whistleblowing Policy reflected in our own Whistleblowing Procedure, which is readily available to all staff. In 2018, we have had no breaches of human rights abuses raised.

### **Supply Chain**

Colas Rail procures a variety of goods and services and manages a complex supply chain of suppliers, around 1300 in 2018. The company expects all suppliers and any subcontractor engaged by the company to respect and conform to its fundamental values as conditions for mutual business. The products and services it procures include, but are not limited to: construction material and supplies; tools; specialised labour for on-site works; fuel and engineering supplies, materials and equipment.

A key step in our human rights due diligence approach is supply chain mapping, which provided us with essential information on the nature and extent of our extended supply chains and allowed us to identify and prioritise high-risk areas. As we increase our understanding, we will work with our suppliers to mitigate any risk, undertake further desk research and supplement this with audits, where necessary. We have identified our labour supply chain as a potential high risk for human rights abuses and are taking steps to assess and manage this risk.

An example of these steps is within our Urban Division where we perform checks that our labour agency providers have a Modern Slavery policy and statement in place and thoroughly vet their operatives. The procurement team also conduct a supplier relationship audit annually where modern slavery compliance is checked. We will continue to roll out such checks across the business, learning from the processes currently in place.

We continue to require any new suppliers to engage with our Sustainability Supplier Statement of Expectations. Through this process, we are embedding Bouygues' CSR Charter for Supplier and Subcontractors where we require the supplier to comply with the principles of the United Nations Universal Declaration of Human Rights and the Fundamental Conventions of the International Labour Organisation (ILO).

### **Training & Recruitment**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in its supply chain and business, Colas Rail provides training to its staff. The following training was delivered in 2018 covering all staff levels across the organisation:

- Managerial staff were trained by legal experts on the Group Code of Ethics and associated compliance programme. This training will continue for any new staff.
- Refresher training was undertaken for the Colas Rail procurement teams on the Modern Slavery Act, the company's obligations under it and the issues of modern slavery in the construction sector. This was supplemented by the CIPS procurement managers undertaking the CIPS Ethical Procurement and Supply e-learning. The online training covered issues including human rights and forced labour in supply chains: the implications, the risks and how to eradicate it. The trainings increased Colas Rail's ability to recognise situations where we needed to consider modern slavery risks and to determine how best to respond. It will further enable us to engage the suppliers more effectively to assure ourselves that there is no slavery or human trafficking in our supply chain.





ON TRACK  
FOR THE FUTURE

- A set of posters and toolbox talks for frontline staff was also developed. The purpose of which was to raise awareness of modern day slavery and the signs to look out for. In addition, it clarified the reporting process for when staff have a concern that someone is the victim of modern slavery. This was cascaded out to staff across all three divisions.

Colas Rail's recruitment process is transparent and reviewed regularly. The company communicates directly with candidates to discuss job opportunities via its recruitment team and to confirm the details of any offer made. Procedures are in place for the vetting of new employees and to ensure that it is able to confirm their identities, that they have the necessary paperwork in place to work in the UK and that they are paid directly into an appropriate personal bank account. Our Equality, Diversity and Inclusion (EDI) Procedure was updated in 2018 renewing our commitment to ensure that we do not facilitate modern slavery through our recruitment process. The procedure includes staff responsibilities relating to EDI across the business and the training, monitoring and complaints framework.

Colas Rail has always been committed to preventing slavery and human trafficking in its business and supply chains. It has a zero tolerance to modern slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps, which Colas Rail has taken in its 2018 financial year to combat slavery and human trafficking.

This statement has been approved by the Board of Directors of Colas Rail Ltd.

**Jean-Pierre Bertrand**  
Chief Executive Officer



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## Acknowledgment and Commitment

Colas Rail is a market leading railway infrastructure services business which promotes and upholds the highest standards of ethical conduct and it expects its supply chain to commit to the same. Colas Rail is dedicated to operating in a business environment free from slavery and human trafficking; yet it recognises that its truly diverse business and international supply chain are at risk of facilitating such crimes.

Colas Rail is part of the Colas Group, a global leader in infrastructure construction and maintenance, which in turn is part of the French multi-national Bouygues Group. The railway division is one of the world’s leading providers of rail infrastructure services. In the UK, Colas Rail combines the engineering skills of all our specialist businesses to provide total solutions in all aspects of railway infrastructure, from high speed rail systems to light and urban rail. Colas Rail is also a national freight operator. It offers a full range of services, supported by a 24 hour control centre based at Rugby. The company’s head office is based in the heart of London with depots at Rugby, Crewe, Bristol, Manchester and Plymouth.

## Organisation’s Structure

Colas Rail employs around 1200 staff and its business is split into 3 divisions:

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## Policies & Due Diligence on Slavery and Human Trafficking

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## Supply Chain

Colas Rail procures a variety of goods and services and manages a complex supply chain of around 1200 suppliers. The company expects all suppliers and any subcontractor engaged by the company to respect and conform to its fundamental values as conditions for mutual business. The products and services it procures include, but are not limited to: construction material and supplies; tools; specialised labour for on-site works; fuel and engineering supplies, materials and equipment.



As part of the Sustainability Statement of Expectations, that are now sent out to all new suppliers, we are also embedding Bouygues' CSR Charter for Supplier and Subcontractors where we require the supplier to comply with the principles of the United Nations Universal Declaration of Human Rights and the Fundamental Conventions of the International Labour Organisation (ILO).

### **Training & Recruitment**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in its supply chain and business, Colas Rail provides training to its staff. As part of its Sustainability Awareness Training, managerial-level staff and above continue to be briefed on the issue. In addition, all new starters are being briefed on the risks of modern slavery as part of the company's Corporate Induction.

Colas Rail's recruitment process is transparent and reviewed regularly. The company communicates directly with candidates to discuss job opportunities via its recruitment team and to confirm the details of any offer made. Procedures are in place for the vetting of new employees and to ensure that it is able to confirm their identities, that they have the necessary paperwork in place to work in the UK and that they are paid directly into an appropriate personal bank account.

Colas Rail has always been committed to preventing slavery and human trafficking in its business and supply chains. It has a zero tolerance to modern slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps which Colas Rail has taken in its 2017 financial year to combat slavery and human trafficking.



**Jean-Pierre Bertrand**  
**Chief Executive Officer**  
**Colas Rail Limited**

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## Organisation's Structure

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- **Colas Rail Infrastructure** gathers all railway construction and maintenance activities for Network Rail and also includes our internal labour supplier PSS.
- **Colas Rail Services** consists of our Freight activities and Services activities such as On-Track Machines, Rail Grinding services and Strategic plant services. Our Design and Survey team also forms part of this division.
- **Colas Rail Urban** is dedicated to urban rail construction and maintenance.

## Policies & Due Diligence on Slavery and Human Trafficking

Colas Rail is committed to ensuring that it is taking the necessary steps to ensure that there is no modern slavery present in its business and supply chain. As part of the wider Bouygues Group, Colas Rail subscribes to the Group's Code of Ethics and seeks to comply with the principles of the UN Global Compact, the UN Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation.

Furthermore, Colas Rail has included boilerplate clauses in all of its standard contracts to require that its suppliers comply with the Modern Slavery Act. In addition, where the company procures products or services from safety critical suppliers or Network Rail suppliers, these are assessed and approved via the RISQS system, which assesses compliance to the Modern Slavery Act, among other requirements.

In addition, Colas Rail has reviewed and updated its Diversity & Inclusion Policy to further strengthen its commitment internally against modern slavery. It has also updated its Whistleblowing Policy so that it



specifically refers to allegations about slavery and human trafficking, to encourage people to raise concerns of this nature.

## **Supply Chain**

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Colas Rail has also prepared a Slavery and Human Trafficking Policy Statement setting out its commitment and requirements against modern slavery in its business and supply chain. This Statement has been cascaded out to the Colas Rail supply chain.

Colas Rail has also begun to evaluate its suppliers to identify potential risk hot spots. One risk area identified is in the procurement of Personal Protective Equipment ('PPE') as the majority of garment manufacturers are based in countries such as Bangladesh, China, etc. where there are varying levels of human rights standards. A Modern Slavery self-certification questionnaire was sent out to these suppliers to evaluate the extent of the risk and Colas Rail will be working with the appointed supplier to manage any identified risks.

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