



Modern Slavery Statement 2021

EQUANS UK
Business Unit
"EQUANS UK"



Our Commitment

The Modern Slavery Act 2015 requires certain businesses to set out the steps they have taken to ensure slavery is not taking place in their operations and supply chain. In line with this commitment, this statement is being made by EQUANS Holding UK Limited (“EQUANS”, “We” or “Our”) on behalf of itself and its subsidiaries operating and established in the UK.

Our business is built upon a culture of robustness and performance, which is underpinned by an individual and collective commitment to maintain the highest ethical standards at all times. We recognise that we have a responsibility to take a robust approach to tackling modern slavery and our organisation is committed to ensuring that our supply chains are free from slavery and human trafficking.



JEAN-PHILIPPE LOISEAU
CEO EQUANS UK & IRELAND

What is Modern Slavery?

Modern slavery is an international crime that affects an estimated 40 million people around the world. It includes victims trafficked from overseas and vulnerable people in the UK who are forced to work against their will or are exploited. This disturbing issue transcends age, gender and ethnicity.

EQUANS UK

EQUANS UK is uniquely placed within the UK to deliver technical services, facilities management, energy efficiency and regeneration services to our customers. Our 13,500 employees combine these capabilities to empower businesses and communities to fully embrace the energy, digital & industrial transitions that are redesigning the way we move, work and live.

Within the UK, EQUANS is comprised of a number of different legal entities which we have organised into two distinct operating divisions.

Our Places & Communities (P&C) division is the leading provider of regeneration services in the UK – covering everything from community regeneration and refurbishment to repairs; maintenance and housing development. We're passionate about creating vibrant, efficient and sustainable communities by using integrated energy and services which make a real difference to people's lives

Our Energy & Technical Services (ETS) division is focused upon the delivery of services and energy-related activities for our other priority market sectors.

Our 13,500 employees combine these capabilities to help accelerate the transition towards a lower carbon and more efficient world - reconciling economic performance with a positive impact on people and the planet.

To ensure our organisation remains efficient, that our processes are consistent and that standards are both set and maintained, there are a number of corporate functions. These functions exist to ensure that risks are mitigated and that there is strong internal compliance/control. The corporate functions include IT, Legal & Ethics, Procurement, Health & Safety, Environment, HR, Finance and Corporate Responsibility and are supported by our Shared Services Centres in Newcastle and Wath upon Dearne.

EQUANS UK in numbers



£2bn+
turnover in 2021



No.1
in regeneration services



c.13,500
employees



170
partnerships with councils



c.10,000
suppliers / sub-contractors

Our Risk Assessment

We have assessed our business for the potential for the risk of modern slavery and concluded that the two main areas where modern slavery could, theoretically, occur are within our own workforce and in the workforce of our supply chain.

However, we consider that we have adopted robust employment practices for recruitment and management of our own staff and we manage the vast majority of temporary workers engaged by us through a small number of specialist providers in respect of which we have undertaken due diligence as described below in more detail. Accordingly, we believe that the risk of modern slavery is more likely within our supply chain than within our own workforce.



Our Supply Chain

Our supply chain involves more than 10,000 suppliers and subcontractors, the majority of which are based in the UK or Republic of Ireland.

Our UK procurement team is committed to delivering goods and services for our operational teams, our customers and stakeholders which are sustainable, are of good quality and which represent the best value for money. In line with the diverse nature of our business endeavours, the competencies of our supply chain and the industries in which they operate vary greatly. For example, our supply chain and subcontractors provide equipment installation and maintenance, cleaning services, security services (including manned guarding), construction work (including civils, plumbing, electrical work, bricklaying, carpentry etc.), grounds maintenance services, IT software, the supply of general building materials and plant hire.

Our procurement team is structured so that it closely reflects the diverse activities

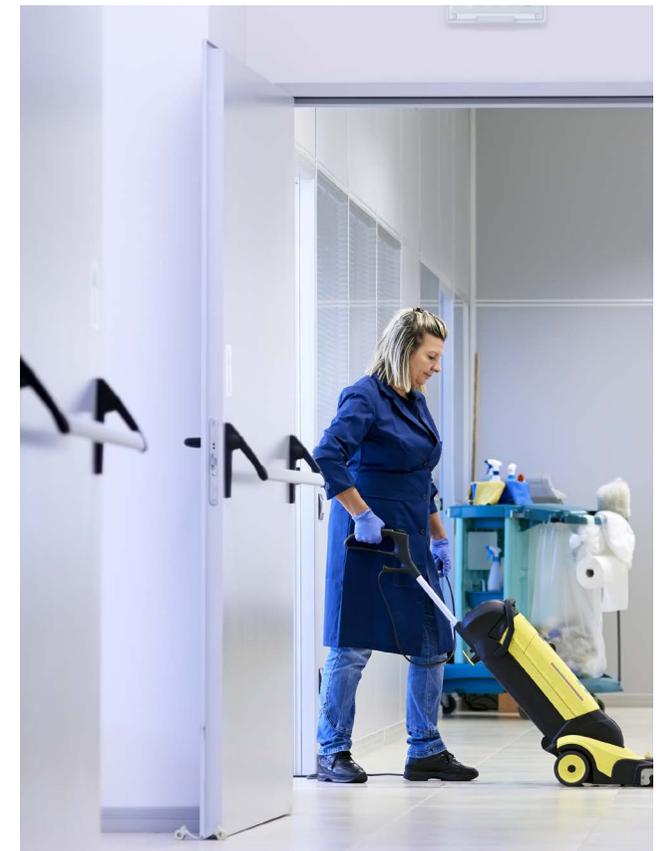
undertaken by our two operating divisions. Goods and services procured on behalf of our ETS division and our central support functions are sourced via our central procurement team. The procurement of goods and materials on behalf of our P&C division is supported by a dedicated divisional procurement team and the procurement of subcontractor services within this division is undertaken locally by our regional operational teams.

We assess risk in our supply chain based on physical, business and volume related risks. On that basis, we review our supply chain to identify areas where potential modern slavery risks may arise.

Having assessed our supply chain for the potential for the risk of modern slavery, we have identified a number of categories of services provided to us by our supply chain where we consider that there is a higher risk of modern slavery or human trafficking occurring.

We have focussed our attention on these areas which are:

- ▶ Cleaning contractors
- ▶ Catering services
- ▶ Construction workers (low and unskilled)



Our Policies & Practices in Relation to Modern Slavery

Ethics are ingrained in the Fundamentals of our company and form a pillar which underpins all of our activities. Our group's Ethics Charter and Practical Guide to Ethics set out expected behaviours in relation to ethical requirements for all employees. The Charter requires every employee to take seriously their role in building and protecting our reputation, by acting in full compliance

Our ethical principles are:

1. Act in accordance with laws and regulations

2. Behave honestly and promote a culture of integrity

3. Be loyal

4. Respect others

with the applicable laws and our values and ethical principles, in all our activities.

In February 2021, we published a Modern Slavery policy which sets out the commitments which we have made in relation to modern slavery. Within the policy, we have specifically outlined the roles which we expect our staff, leadership team and suppliers to take in supporting our commitment to eradicate modern slavery in all of its forms.

In addition, we have in place a set of policies, processes and procedures which seek to ensure that slavery and human trafficking is not taking place in our supply chain or our operations. These include:

- ▶ Outlining our expectations of our supply chain and our approach to a range of issues including modern slavery and

ethical conduct of our supply chain in our Responsible Procurement Policy and Supplier Charter

- ▶ Our Code of Conduct in Supplier Relations which sets out the principles we follow when dealing with suppliers.
- ▶ Establishing responsible procurement as one of the seven enablers for our business in our UK Procurement 2021 Strategy.
- ▶ Undertaking due diligence on our supply chain as described below.
- ▶ Entering into contractual commitments with our supply chain as described below.
- ▶ Providing our suppliers with access to a specific whistleblowing hotline.
- ▶ Establishing a supplier portal to enable our supply chain to access online training, the whistleblowing hotline and other valuable reference material.

We assess instances of non-compliance, of which we become aware, and take appropriate remedial action as expeditiously as possible. We are committed to ceasing trading with suppliers showing persistent disregard for important elements of environmental, social and ethical performance.

In 2020, ENGIE Regeneration Limited became a signatory to the Gangmasters & Labour Abuse Authority's (GLAA) modern slavery construction protocol. As a signatory to the protocol, we are committed to working in partnership with our clients, suppliers and external stakeholders to ensure that information is effectively shared with the primary objective of protecting vulnerable individuals from exploitation or abuse.

Following an audit which was conducted by EcoVadis, in 2021 EQUANS UK was awarded a Platinum award in respect of its activities in the fields of ethics and corporate social responsibility. This assessment places EQUANS UK in the top 1% of all organisations which have been audited using EcoVadis' methodology. Specifically, recognition was made of EQUANS UK's exceptional policy stance on ethics issues.



Our Due Diligence Process

In our own operations

We have developed an internal “Ethics and Compliance” reporting system.

This reporting system provides a place where acts of potential unethical or non-compliant behaviour, which would include modern slavery or human trafficking, can be reported for escalation. This reporting system comprises a clear mechanism for reporting of any issues and the whistleblower may remain anonymous if they so wish. Any matters raised are assessed through a formal investigation procedure and considered by a committee of the EQUANS UK board.

Our people are subject to various appropriate pre-screening checks during recruitment. This includes right to work checks pre-employment and throughout employment for those individuals whose right to work is not permanent.

We ensure that the majority of temporary labour (other than some office-based workers) is sourced through our Managed

Service Provision Programme. This programme enables us to engage workers through two main suppliers of temporary labour and our contracts with these suppliers require them to adhere to the highest ethical standards.

Our contractual relationship with these suppliers of temporary labour also requires them to undertake robust onboarding checks before an individual will be engaged. Furthermore, these suppliers are required to conduct a further audit of a pre-determined number of workers biannually, during which they further validate the worker’s right to work and confirm that the worker’s remuneration is paid into a bank account in the worker’s name.

In addition to workers engaged through our Managed Service Provision Programme, on occasion we may source temporary office-based workers through other specialist suppliers. Our risk assessment has determined that these workers present



a lower risk of modern slavery and, so whilst these workers will only be sourced through agencies who have agreed to our preferred supplier contractual terms, there is no requirement for those suppliers to undertake a biannual audit on those workers.

In our supply chain

Prior to their engagement, we require all suppliers (save for sub-contractors and smaller suppliers within our regeneration business within our P&C division) to complete our supplier questionnaire. This requires the supplier to provide information regarding the risk assessment and due diligence measures they have implemented to mitigate the risk from modern slavery within their organisation and supply chain. Responses to the supplier questionnaire are subject to a desktop audit which is conducted jointly by staff from our Procurement, Finance, Health and Safety and Environment teams. During the onboarding process, these suppliers are required to confirm that they can, and will, adhere to the commitments presented within our Supplier Charter. These commitments ensure that our suppliers support us in achieving our ethical ambitions which includes adherence to the highest standards in the fields of ethics (including modern slavery), health and safety and the environment.

Additionally, we have undertaken due diligence investigations on all preferred and strategic suppliers to our business (over 250 suppliers).

Our suppliers are contractually required to implement due diligence on their own suppliers and subcontractors to ensure that slavery or human trafficking does not exist within in their supply chain. Suppliers are also required to notify us if they discover any actual or suspected slavery or human trafficking within their supply chain.

Subcontractors within our regeneration business within our P&C division are required to complete an Ethics & CSR questionnaire, both during the onboarding stage and thereafter on an annual basis. This requires the subcontractor to confirm their compliance with relevant legislation, document the due diligence measures which they have implemented within their own supply chain, as well as outlining measures which they have introduced to enable employees and/or external stakeholders to raise concerns regarding potential incidences of Modern Slavery or other unethical behaviour.



Training our Employees and Suppliers

Suppliers

We have published an online training module which is available for all suppliers via our supplier portal. We have also held some workshops with these suppliers in relation to combatting slavery and human trafficking.

Employees

Our staff are all required to undertake mandatory ethics training, which includes a bespoke Modern Slavery module which is designed to ensure that our staff are

appropriately trained to identify the signs of modern slavery and know how to report any concerns in a timely and effective manner.

All employees are bound, by virtue of their terms of employment, by our policies, charters and codes of conduct.

We have published a 'modern slavery – know the signs' poster designed to raise awareness of the signs of modern slavery which is prominently displayed in all of our offices and sites.



Measurement of Our Progress

We have developed a set of key performance indicators (KPIs) to report our performance which includes:

- ✓ Completion of modern slavery training by employees.
- ✓ Performance of due diligence investigations on all preferred and strategic suppliers to our business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for EQUANS Holding UK Limited (on behalf of itself and its subsidiaries) for the financial year ending 31 December 2021.

Jean-Philippe Loiseau
CEO EQUANS UK & Ireland

Date

30/06/2022

Our Future Plan

As part of our commitment to tackling modern slavery during 2022, we will undertake the following additional enhanced due diligence on our top 50 suppliers by spend across our business.

These suppliers will be required to complete a questionnaire detailing the following:

- a) Risk mapping which the supplier has performed on its own supply chain;
- b) Policies or procedures which have been introduced by the supplier to prevent modern slavery;
- c) Audits or due diligence which the supplier has performed on its own supply chain;
- d) Training which the supplier has delivered for its staff/supply chain relating to modern slavery.





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