

# Modern Slavery Statement 2022

**Equans UK & Ireland  
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 take a zero-tolerance approach to 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, and it is estimated that almost 50 million people around the world are victims of slavery. This figure 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. . This disturbing issue transcends age, gender and ethnicity.



# Equans UK

Within the UK, Equans is comprised of a number of different companies which we have organised into separate operating divisions.

Our aim is to be recognised as the undisputed leader in accelerating our customers' transitions to a low carbon and more resilient world.

Our **Places & Communities** division is a market leader for sustainable refurbishment and maintenance, covering everything from community regeneration and refurbishment to repairs, maintenance and housing development.

Our **Technical Services** division is a market leader for sustainable facilities management.

Our **Digital & Energy Services** division is focused upon delivering digital and energy transitions through innovative, data led solutions.

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.

The Equans group has set 3 absolute must haves as part of our operations. These are focussed on Health & Safety, Ethics (including modern slavery) and Cyber Security. These 3 must haves underpin our business at a global and UK level.



## Equans UK



**£2bn+**  
turnover in 2022



**No.1**  
in regeneration services



**c.13,500**  
employees



**Strategic supplier**  
to HM government



**170**  
partnerships with councils



**c.10,000**  
suppliers / sub-contractors

# 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 function is committed to delivering goods and services for our operational teams, our customers and stakeholders which are sustainable, are of the highest 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 provides goods, 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 function is structured so that it closely reflects the diverse activities undertaken by our operating divisions. Goods and services procured on behalf of our Technical Services and Digital & Energy Services divisions and our central support functions are sourced via our operational and central procurement teams.

The procurement of goods and materials on behalf of our Places and Communities division is supported by a dedicated divisional procurement team, whereas the procurement of subcontractor services within this division is undertaken locally by our regional operational teams.





# Our Risk Assessment

When assessing our business for the potential risk of modern slavery the two main areas where modern slavery could 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 any temporary workers engaged by us through a 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.

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

As an outcome of this review, 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

Equans UK has implemented a number of policies and procedures which are relevant to preventing modern slavery from occurring within our business or supply chains. All employees are bound, by virtue of their terms of employment, by our policies, charters and codes of conduct including our group's Code of Ethics as outlined below.

**Code of Ethics** – Our group's Code of Ethics requires every employee to take seriously their role in building and protecting our reputation and sets out expected behaviours in relation to ethical requirements for all employees. The Code requires employees to comply with the principles of the United Nations Universal Declarations of Human Rights, the fundamental conventions of the International Labour Organisation, in particular, concerning forced child labour and the principles of the United Nations Global Compact.

**Modern Slavery policy** – This policy sets out the specific commitments which we have made in relation to modern slavery, and the roles which we expect our staff, leadership team and supply chain to take in supporting our commitment to eradicate modern slavery in all of its abhorrent forms.

**Equans Ethics Guidelines** – This document sets out the Equans group's fundamental ethical principles and references the various ethics policies which apply to our everyday business activities.

**IMPACT Charter** - The charter lays out 7 commitments covering a range of topics including social value, environment, safety, health and wellbeing, cybersecurity, diversity and inclusion and ethics.

**Reporting concerns/whistleblowing** – Colleagues and external stakeholders are able to report concerns of potential unethical or unlawful behaviour anonymously and in confidence via our whistleblowing platform.

Details of this platform are available on our website ([www.equans.co.uk/ethics](http://www.equans.co.uk/ethics)) and on posters displayed predominantly across our offices and sites. Any matters raised are assessed through a formal investigation procedure and considered by a sub-committee of the Equans UK board.

We have also implemented the following additional measures in support of the above policies and procedures:

- ▶ 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, the latter of which our supply chain sign up to during the Equans onboarding process.
- ▶ Adoption of the Prompt Payment code.
- ▶ Undertaking due diligence on our supply chain as described below.
- ▶ Entering into contractual commitments with our supply chain as described below.
- ▶ Providing our supply chain with access to a specific whistleblowing hotline.
- ▶ Providing our supply chain with access to online training and other valuable reference material.



We assess instances of non-compliance with these policies and procedures, of which we become aware, taking appropriate remedial action as expeditiously as possible.

We are committed to ceasing trading with suppliers which show persistent disregard for important elements of environmental, social and ethical performance.

Following a comprehensive audit which was conducted by EcoVadis, in 2022 Equans Services Limited was awarded a gold award in respect of its activities in the fields of ethics and CSR. This assessment places Equans UK in the top 5% of all organisations which have been audited using EcoVadis' methodology.





# Our Due Diligence Process

## In our own operations

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 also perform regular checks to establish whether a single residence and/or bank account are used by more than one employee, factors which could be indicators that a worker is being held in slavery.

We ensure that the majority of temporary labour (other than some office-based workers) is sourced through two Managed Service Providers. This model enables us to access workers from a number of tier 2 labour providers via our Managed Service Providers. Our contractual relationship with the Managed Service Providers requires them to undertake robust onboarding checks before a worker is engaged, and they are also required to regularly audit a number of workers provided by each tier 2 supplier. Our Managed Service Providers are also required to produce an annual slavery and

human trafficking report, which sets out the measures they have taken to ensure that slavery and human trafficking is not taking place within their business or supply chains.

In addition to workers engaged through our Managed Service Providers, 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 in the Places & Communities (P&C) division) to complete our supplier due diligence 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 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 include adherence to the highest

standards in the fields of ethics (including modern slavery), health and safety and the environment.

Additionally, we undertake annual due diligence investigations on all preferred and strategic suppliers to our business.

We endeavour to ensure that our suppliers implement due diligence on their own suppliers and subcontractors to ensure that slavery or human trafficking does not exist within 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

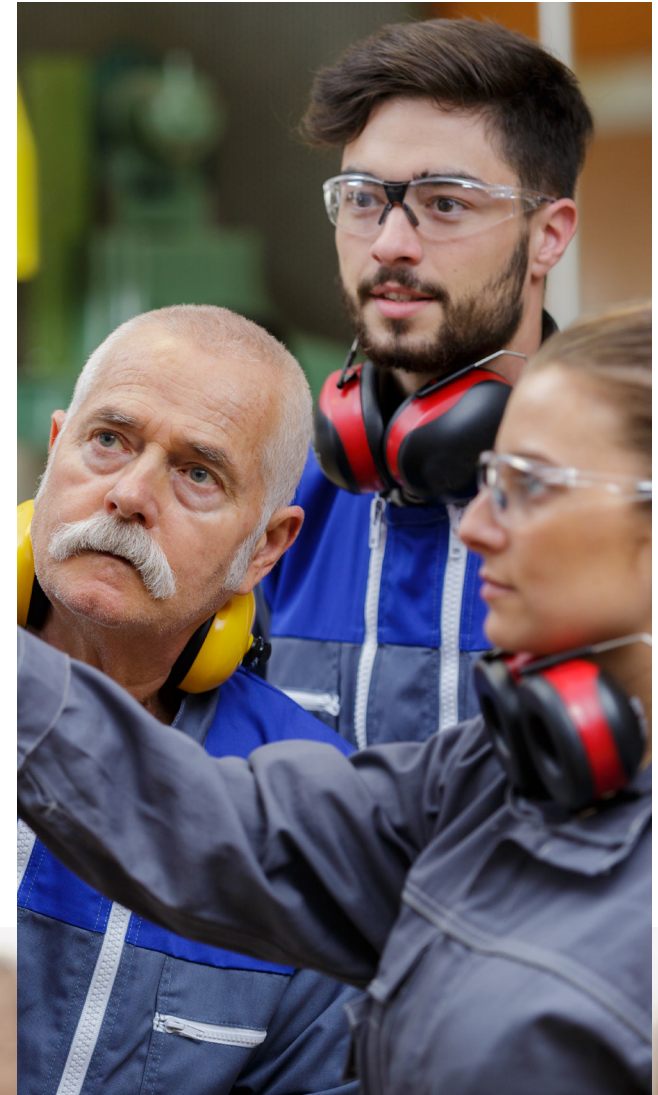
## Suppliers

We have held workshops for our supply chain in relation to combatting slavery and human trafficking and we provide our suppliers with access to training provided by the Supply Chain Sustainability School.

## Employees

When joining Equans UK, every employee is required to complete a mandatory online training session dedicated to ethics and compliance. Additionally, every member of

Equans UK staff is required to complete an online training designed to assist staff in identifying the signs of a person possibly being a victim of modern slavery and to ensure that staff understand how to report any concerns using our whistleblowing platform in a timely and effective manner. Completion of these training modules is monitored and the training has been supplemented by a 'modern slavery – spot the signs' poster, which has been displayed at 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 (81.3% as of 31/12/2022)
- ✓ Completion of due diligence investigations on all preferred and strategic suppliers to our business (Complete).

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 2022

**Jean-Philippe Loiseau**

CEO Equans UK & Ireland

**Date**

30/06/2023

## Our Future Plan

As part of our commitment to tackling modern slavery during 2023 we will continue to undertake due diligence investigations on all preferred and strategic suppliers to our business.

During 2023 we will appoint an external provider to perform the following activity.

1. A gap analysis of the measures we have implemented to tackle modern slavery within our organisation and supply chain.
2. A further Supply chain risk assessment in order to ensure that an appropriate level of due diligence is undertaken on higher risk activities/categories of spend.





[equans.co.uk](https://equans.co.uk)