



Slavery and Human Trafficking Statement

Introduction

Colas Rail publish this statement in accordance with the Modern Slavery Act 2015. This statement sets out the steps taken during the year ending 31 December 2021 to prevent slavery and human trafficking at Colas Rail and in its supply chain.

Colas Rail is dedicated to operating a business free from slavery and human trafficking. However, Colas Rail operates in a high-risk sector, due to the construction industry being vulnerable to slavery and human trafficking because of its demand for manual and wage-based work. Colas Rail also recognises that its diverse business and international supply chain are at risk of facilitating such crimes.

Policies & Due Diligence on Slavery and Human Trafficking

The Colas Rail policies which demonstrate our ethical approach and combat slavery and human trafficking are:

- The Group Code of Ethics,
- Whistleblowing Procedure, and
- The Equality, Diversity and Inclusion Policy.

These policies are readily available to all staff via the intranet and in our offices and are provided to all new starters as part of the Colas Rail induction.

In 2022, Colas Rail will review internal policies, including the Equality, Diversity and Inclusion Policy to ensure that they are pertinent and to identify areas of improvement.

The “Unseen” application, which educates staff and allows them the opportunity to raise slavery and trafficking concerns both during and outside of work hours via the modern slavery helpline, continues to be available on Colas Rail smartphones. Slavery and trafficking concerns can also be reported internally via the Whistleblowing Procedure. Colas Rail promoted this during its Anti-Slavery awareness day in October 2021 and will do so at its Anti-Slavery awareness day in 2022.

Colas Rail continues to provide new suppliers with the latest CSR Charter for Supplier and Sub-Contractors and the Colas Rail Health, Safety and Sustainability Statement of Expectations (updated in May 2021) as part of the Colas Rail Supplier and Sub-Contractor on-boarding process.

In 2021 Colas Rail, in collaboration with other industry partners, developed and published the Modern Slavery Emergency Response Plan. The plan was shared across the business and with employees via the Colas Rail intranet, and it sets out the correct steps for identifying, dealing with, and reporting suspected modern slavery.

Supply Chain

Colas Rail procures a variety of goods and services and manages a complex supply chain. Colas Rail continually monitors and manages its supply chain to satisfy its due diligence requirements. As a minimum, we run compliance checks on the top 50 suppliers (by spend) for all divisions of Colas Rail, and we continue to try to check as many suppliers as possible.

In 2021, new suppliers tendering to provide works or services to Colas Rail were required to complete a modern slavery risk assessment questionnaire to identify any potential risk areas. This was assessed by the Colas Rail Safety and Sustainability team and included in the tender score card. Colas Rail is committed to only doing business with those companies who have taken active steps to mitigate the risk of slavery and human trafficking in their business. We will continue to utilise this modern slavery risk assessment questionnaire in our tendering activities.

New suppliers are asked to demonstrate their commitment to preventing modern slavery by signing the Colas Rail Health, Safety and Sustainability Statement of Expectations. This statement contains an undertaking to ensure that no modern slavery is present in the business or supply chain, as well as our other sustainability initiatives. In addition to this, in 2021 we collected the latest Slavery and Human Trafficking Statements from our active suppliers who are not exempt from producing one. We will continue to do this in 2022.

In addition to the above, in 2021 Colas Rail:

- Committed to re-energising discussions with our existing suppliers around performance review meetings and their action plans to monitor and mitigate the risk of slavery and human trafficking. Unfortunately, this was somewhat hampered by the Coronavirus pandemic, but we aim to begin this process again in 2022.
- Challenged our supply chain to ensure the highest standards of fitness to work and occupational health with labour and operated plant providers. We will continue to do this in 2022.
- Committed to auditing our top suppliers to ensure that they are getting paid the correct rates. Although we moved back to face-to-face meetings, we have not been able to fully audit all suppliers, in part because of the Coronavirus pandemic. These deferred audits have been rescheduled to take place in 2022. We will also work on improving and standardising our auditing of suppliers across the business divisions, and creating KPIs to map the risk levels of suppliers.
- Reviewed our contractual provisions to ensure that they are effective in preventing slavery and human trafficking by improving audit rights and visibility. We continue to review the terms on which we engage with our supply chain to ensure that they are as effective as possible.

Coronavirus

We are committed to preventing the spread of Coronavirus and ensuring the safety of our customers, employees and supply chain partners. In order to facilitate this, we created a Covid-19 taskforce to monitor risk and adapt accordingly.

We also continue to follow the Government advice and guidance, and we adjusted our processes and procedures to eliminate the risk of transmission across our business by providing PPE, implementing one-way systems, and reducing supplier site-visits.

As Coronavirus draws to an end, we are working on a safe return to work for all our employees.

This statement has been approved by the Executive Committee of Colas Rail on 29th March 2022.



Jean-Pierre Bertrand
Chief Executive Officer