



Slavery and Human Trafficking Statement

Introduction

Colas Rail publishes this statement in accordance with the Modern Slavery Act 2015. This statement sets out the steps taken during the year ending 31 December 2022 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,
- The Equality, Diversity and Inclusion Policy, and
- Sustainable Procurement 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 reviewed internal policies, including the Equality, Diversity and Inclusion Policy to ensure that they are pertinent and to identify areas of improvement. Colas Rail created the Modern Slavery and Human Trafficking policy and procedure to set out Colas Rail's zero-tolerance stance on the issue. This policy and procedure are due to be finalised in early 2023.

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 2022 and will continue to do so at its Anti-Slavery awareness day in 2023.

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 March 2022) as part of the Colas Rail Supplier and Sub-Contractor on-boarding process.

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, compliance checks are conducted on the top 50 suppliers (by spend) and suppliers considered to be high-risk (or potentially high risk) for modern slavery for all divisions of Colas Rail, and Colas Rail continually strives to try to check as many suppliers as possible.

In 2022, new suppliers tendering to provide works or services (with a value of £500,000 or more) 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. Colas Rail will continue to utilise this modern slavery risk assessment questionnaire in tendering activities.

In addition, in 2022 Colas Rail began the process of creating a Modern Slavery Audit Questionnaire, which will be used on high-spend and high-risk suppliers to identify areas of risk and to help Colas Rail produce actions plans for these suppliers, which will help our supply chain to minimise risks of modern slavery and human trafficking. Colas Rail aims to finalise the audit questionnaire in 2023 and it will be used by all Colas Rail divisions.

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 2022 Colas Rail collected the latest Slavery and Human Trafficking Statements from our active suppliers who are not exempt from producing one. Colas Rail will continue to do this in 2023.

In addition to the above:

- In 2023, Colas Rail will continue discussions with our existing suppliers around performance review meetings and their action plans to monitor and mitigate the risk of slavery and human trafficking.
- In 2022, Colas Rail 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 2023.
- Colas Rail will continue to audit top suppliers to ensure that they are paying staff the correct rates. Colas Rail 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.
- In 2023, Colas Rail aims to expand reviews and meetings to more suppliers, not just Tier 1 suppliers. Subject to the Modern Slavery Audit Questionnaire being launched, we aim to audit all labour suppliers.
- Colas Rail will continue to review contractual provisions to ensure that they are effective in preventing slavery and human trafficking by improving audit rights and visibility. We also continue to review the terms on which we engage with our supply chain to ensure that they are as effective as possible.

This statement has been approved by the Executive Committee of Colas Rail on 29 March 2023.



Jean-Pierre Bertrand
Chief Executive Officer