

# Slavery and Human Trafficking Statement

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## 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 2023 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,
- The Whistleblowing Procedure,
- The Equality, Diversity and Inclusion Policy,
- The Anti-Slavery and Human Trafficking Policy,
- The Modern Slavery Emergency Response Plan, and
- The Sustainable Procurement Policy.

These policies are readily available to all staff via the intranet and in our offices.

In 2023, Colas Rail reviewed internal policies, including the Equality, Diversity and Inclusion Policy to ensure that they are pertinent and to identify areas of improvement. In 2023, Colas Rail finalised the Modern Slavery and Human Trafficking policy and also began work on the Modern Slavery procedure, which set out Colas Rail's zero-tolerance stance on the issue. In 2024, Colas Rail aims to finalise the Modern Slavery procedure.

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 2023 and will continue to do so at its Anti-Slavery awareness day in 2024.

The Sustainable Procurement Policy was updated in 2023, and strengthened as follows:

- We increased Corporate Social Responsibility ('CSR') in our tender scoring to 15% from 10%. The 15% includes requirements for anti-slavery mitigations within the supply chain.
- An extra bullet point was added to state that we will carry out a modern slavery assessment of suppliers trading in labour intensive or high-risk categories.

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 as part of the Colas Rail Supplier and Sub-Contractor on-boarding process. 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 2023 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 2024.

## **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 75 suppliers (by spend and per division) and suppliers considered to be high-risk (or potentially high risk) for ethical non-compliance for all divisions of Colas Rail, and Colas Rail continually strives to try to check as many suppliers as possible.

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. To ensure that Colas Rail's supply chain is free from modern-slavery, Colas Rail introduced the Modern Slavery and Human Trafficking Questionnaire, which allows us to audit our supply chain. The questionnaire is completed by high-spend and/or high-risk suppliers, to identify areas of risk. It also enables Colas Rail to produce actions plans for these suppliers, which will help our supply chain to minimise risks of modern slavery and human trafficking.

Colas Rail will continue to utilise this Modern Slavery and Human Trafficking Questionnaire in 2024.

In addition to the above, in 2023, Colas Rail were accredited as Living Wage Employers. This includes all third party contracted staff, such as cleaners, who we will ensure are paid the real Living Wage.

In 2024:

- Each division aims to audit at least 20 suppliers for modern slavery, and to include the Modern Slavery Questionnaire in tender packs.
- 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.
- Colas Rail will complete the Modern Slavery Assessment Tool again, in order to re-evaluate our risks and to continue to effectively and proactively address any modern slavery risks in our business and supply chains.
- 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.
- Colas Rail will continue to challenge our supply chain through supply chain management review meetings to ensure the highest standards are being maintained.
- 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.

This statement has been approved by the Executive Committee of Colas Rail on 27<sup>th</sup> March 2024.



**Jean Pierre Bertrand**

**Chief Executive Officer**