



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Company Approach

Bachy Soletanche is the UK subsidiary of the Soletanche Bachy Group, the world's largest specialist geotechnical contractor with a turnover in excess of £1 billion. Soletanche Bachy has over 10,000 employees based in 50 countries. Bachy Soletanche conducts projects in the UK, Ireland and Northern Europe.

Bachy Soletanche is one of the UK's leading geotechnical specialists with a reputation for quality and innovation within the field of foundation and underground engineering.

Bachy Soletanche is also part of the VINCI Group of companies, one of the largest global built environment organisations. Being part of the same group lends itself to collaborative working, following similar procedures and having access to a global resource in terms of people, equipment, technology and common suppliers.

All group companies share a mutual code of ethics and conduct, the code is delivered by the Director and Chief Executive Officer of the VINCI Group. Principles of the code of ethics and conduct are reflected within our vision of developing our modern slavery statement.

Bachy Soletanche takes its responsibility to avoid and mitigate any modern slavery in its operations extremely seriously. To that end we have developed a detailed policy and strategy that runs over 3 years to support this statement. Our approach to modern slavery shall be governed by our main board, who shall provide leadership from the top down, continually striving for best practice and leading by example. Our modern slavery policy will be communicated to our supply chain, embedded into our procurement policy and will become a part of the way we work.

Our People

We have in place a number of key policies which explicitly state how we operate as a business and the steps taken to ensure that we are a transparent, accessible and inclusive organisation. These policies are reviewed regularly and updated to ensure that ongoing opportunities for improvement are identified and acted upon. These policies include:

- Code of Ethics and Conduct
- Corporate Social Responsibility
- Anti-Bribery
- VINCI Manifesto

- Equality
- Recruitment and Selection
- Whistleblowing
- Supplier Code of Conduct
- Ethical Procurement Policy

We carry out Right to Work and Pre-Employment checks on all employees joining our organisation and this includes the employee being able to provide evidence that they are in possession of their own identification documents and that the bank account details provided belong to the employee and not a third party. Any discrepancies identified are investigated thoroughly and appropriate action taken.

We have internal procedures accessible to employees for them to highlight any concerns they may have. All reports received are treated seriously and are dealt with in line with the process outlined within the Whistleblowing section of the staff handbook.

In respect of our contingent labour and resource processes, we operate a robust system, working with a consistent number of recruitment agency partners, to fulfil our contingent workforce requirements. We have in place annual reviews with the recruitment agency partners.

Supply Chain

We have a robust approach to supply chain management and understand that it is critical to the success of our modern slavery strategy and policy to engage with, support and develop our supply chain in this regard.

In developing our strategy and policy in relation to modern slavery, Bachy Soletanche Limited has taken the following steps:

1. Created and lead a Modern Slavery Working Group, with members from different disciplines and various parts of the UK businesses within the VINCI Group.
2. Started recording information relating to modern slavery during the prequalification process.
3. Communicated its policy and statement to internal employees.
4. Communicated its policy and statement to its supply chain.
5. Added additional language to its standard contractual terms with its suppliers and sub-contractors in relation to modern slavery.
6. Produced an E Learning Module for its employees and supply chain
7. Members of the group work as part of the Supply Chain Sustainability School Modern Slavery special interest group to work collaboratively with other main contractors and suppliers to highlight risk areas within our supply chain.
8. We have promoted the Supply Chain Schools resources to our key supply chain.

Our policy and 3-year modern slavery strategy have been developed by the dedicated Modern Slavery Working Group. As a group we work closely with the Supply Chain Sustainability School and work cooperatively with our peers to identify modern slavery risk within our supply chains as part of this process.

As is detailed in our 3 year strategy, some of the key actions we have delivered in year 2 are:-

1. Increased the level of detail in relation to modern slavery within our pre-qualification process.
2. Developed and published a Supplier Code of Conduct
3. Developed and published an Ethical Procurement Policy
4. Increased the group members of our working group from different disciplines and various parts of the UK businesses within the VINCI Group.
5. Identified some of our risk areas through heat mapping, the complexity and involvement in this exercise is greater than what was expected so we have not accomplished as much as planned. No training or development has begun yet with these suppliers
6. Produced an information sheet on some of our highlighted risk areas in the supply chain which shows the suppliers basic information, risk areas, what checks are currently carried out and what needs to be done.
7. We are in the approval process of becoming part of the United Nations Global Compact

Objectives for Year 3

1. Continue to Increase the level of detail in relation to modern slavery within our pre-qualification process.
2. Continue to develop our Supplier Code of Conduct
3. Continue to develop our Ethical Procurement Policy
4. Continue to develop our heat mapping process
5. Continue to produce supplier information sheets based on our findings
6. Where viable, give preference to the use of timber and timber products, which are assured as 'Grown in Britain'
7. Develop a new three-year strategy
8. Develop guidance and training our supply chain may require
9. Ensure the E Learning Module is available to all our supply chain
10. We will continue to develop clauses on modern slavery in our other standard contractual terms.

We will report on the success of the above actions in our 2020 statement as well as set the objectives for the following year.

This statement is made in accordance with Section 54 (1) of the UK Modern Slavery Act 2015 and constitutes Bachy Soletanche Limited's Modern Slavery Statement for the financial year end 31st December 2018. This statement has been approved by the Board of Directors on 8th May 2019.

Christopher Merridew



Managing Director

Bachy Soletanche Limited

May 2019