



AW EDWARDS

SLAVERY AND HUMAN TRAFFICKING STATEMENT CALENDAR YEAR 2022

June 2023

1. Identification of Reporting Entity and Purpose

This statement (the “Statement”) is made on behalf of A.W. Edwards Pty Ltd (ABN 76 000 045 849) of Level 2, 131 Sailors Bay Road, Northbridge NSW 2063 (AW Edwards) pursuant to section 13 of the Modern Slavery Act 2018 (Cth) (the Act).

AW Edwards takes its obligations in relation to the identification, prevention and reporting of modern slavery and human trafficking seriously. It is working hard to identify and reduce the risk of modern slavery and human trafficking in its supply chains or in any part of its business and has a zero-tolerance approach to modern slavery. Its anti-slavery policy reflects its commitment to acting ethically and with integrity in all its business relationships. In July 2018, AW Edwards became a subsidiary of Bouygues Bâtiment International (a French construction company operating in five continents) and part of the Bouygues Group. AW Edwards adheres to a worldwide group Code of Ethics personally supported by Martin Bouygues, Chairman and CEO of Bouygues SA and pursuant to this, undertakes to comply with the strictest legal and moral standards in the conduct of its operations.

AW Edwards has a zero-tolerance approach to modern slavery. AW Edwards is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or in any of its supply chains.

This Statement sets out what AW Edwards has done in the calendar year 2022 to work towards ensuring that slavery and human trafficking is not taking place in any part of its businesses or supply chains.

2. AW Edwards’ structure, operations and supply chain

AW Edwards is a private limited company that provides building construction services in Australia (predominantly NSW) to public, private, government and institutional clients. AW Edwards is incorporated in Australia and has its headquarters in Northbridge, Sydney. It has around 317 direct employees in Australia. AW Edwards is the sole owner of Linkcity Pty Ltd. AW Edwards is part of a group of companies worldwide which have Bouygues SA, a CAC 40 company listed on the Paris Euronext, as their ultimate parent. The Bouygues group has over 196,154 employees worldwide and operates in approximately 81 countries.



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As a leading commercial construction contractor, AW Edwards has a complex supply chain model that both supports its core businesses and maintains its office and technology infrastructure. AW Edwards' supply chain relates mainly to the following activities:

- **Subcontracting** – the specialist contractors necessary to deliver certain construction and fit out operations on AW Edwards' construction sites, including hiring specialist equipment and the use of labour hire companies;
- **Supply and Transport of specialist equipment, products and materials** – the purchasing and transportation of the specialist equipment, products and materials it uses in its construction and fitout projects. In this context, AW Edwards' supply chains include overseas factories in the Asia Pacific region, where products such as cladding, fencing, steel, mechanical and electrical components are sourced. These products are then imported into Australia and subsequently distributed to AW Edwards' sites;
- **Consultancy** - professional and consultancy services from design professionals in various fields, including, without limitation, architecture, engineering (such as structural, civil, façade and mechanical and electrical) lighting, landscape design, sustainability, project management, cost consultancy and surveying;
- **Business services** – a wide range of products and services necessary to maintain normal day to day operations in its offices and support its core business functions such as cleaning, catering, security, IT support and print services;
- **Professional services** – professional services such as external training, audit services and advisory services in areas such as tax, regulation, insurance and law;
- **Real estate** – the purchase or leasing of office space to accommodate staff and operate its business;
- **Technology** – the systems, software and equipment that are necessary to maintain the technology infrastructure that supports AW Edwards' core business; and
- **Travel** – AW Edwards works with a number of travel providers such as hotels and airlines.

Generally, AW Edwards' relationships with its suppliers are often short term and changeable.



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3. Risks of modern slavery in A W Edwards' supply chain

AW Edwards considers it unlikely that it would directly cause modern slavery practices but realises that it could inadvertently contribute to them. Risks have been identified in the following areas of AW Edwards' supply chain:

- The engagement of labour through labour hire companies for execution of AW Edwards' projects. AW Edwards is aware that the labour hire industry has been highlighted as a high-risk industry for potential exploitation of migrant workers;
- The procurement of equipment and specialist machinery from overseas supplier factories for its construction and fit out business. Some of these companies, such as those manufacturing cladding, vertical transportation, mechanical and electrical components, are in countries reported (by international organisations and NGOs) to have a high prevalence of modern slavery e.g. China;
- The procurement of materials, such as cladding, for its building projects. Whilst AW Edwards endeavours to purchase such materials from Australian suppliers, there are situations (such as to meet a large or urgent order) AW Edwards will procure materials from overseas suppliers, again usually in China, where it does not have direct oversight of labour practices used by material suppliers;
- The procurement of staff uniforms and PPE for site workers. AW Edwards is aware that the textiles and clothing sector is a high risk sector. AW Edwards does purchase uniforms branded with the company logo and PPE from Australia based companies, but does not yet have insight into the working conditions of the various countries and facilities that such items of clothing and PPE are manufactured in.

4. Actions taken by AW Edwards to address modern slavery risks

4.1 Policies in relation to modern slavery and human trafficking

AW Edwards has several policies and procedures which are relevant to preventing instances of modern slavery from occurring in its business or its supply chains, including having a dedicated compliance officer to whom breaches of any policies can be notified. In particular, the following policies are directly relevant to the subject matter of this Statement:

- **Anti-slavery policy** – this policy specifically addresses the subject matter of the Act recognising and preventing trafficked, forced, bonded and child labour.


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- **Code of Ethics** – this 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;
- **CSR Charter for Suppliers and Subcontractors** – this charter sets out the standards the Bouygues Group including AW Edwards expects from its supply chain in several areas, including compliance with labour standards;
- **Whistleblowing Policy** – this policy encourages employees, subcontractors and suppliers to bring any bad practice they become aware of to the attention of an ‘Eligible Recipient’ under Australian Whistleblowing legislation without fear of repercussions for doing so;
- **Health & Safety policy** – this policy sets out AW Edwards’ commitment and approach to ensuring it provides a healthy, safe working environment for its own staff and contractors that work on-site;
- **Harassment & Bullying policy** – this policy sets out AW Edwards’ approach to preventing the occurrence of discrimination, harassment, bullying or victimisation in the workplace;
- **Screening process** – high risk subcontractors and suppliers proposed for a project are screened. This allows elimination of subcontractors and suppliers which do not adhere with AW Edwards’ compliance framework. It also allows a risk profile to be allocated at the start of the business relationship which is reviewed periodically until the end of the relationship. AW Edwards’ screening processes were updated and enhanced during the 2022 reporting period; and
- **Delegations Authority and contract signing procedure** – this policy sets out AW Edwards’ internal control and governance procedures with regards to approving financial transactions and signing contracts with suppliers. This procedure ensures that contracts cannot be entered into without an appropriate level of review and authorisation by a suitably senior and qualified member of staff.

These policies are available on the AW Edwards Internal Management System, emailed to employees and relevant policies are made available to the supply chain during procurement.



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During the 2022 reporting period, AW Edwards also began implementing the Elker platform. Elker is an online platform developed by an independent consultant for employees to confidentially and anonymously (at their option) report any feedback or observations in relation to any business activity, including for example incidences of suspected modern slavery. This provides another forum for those at risk and who may not wish to use email or other more traditional methods of reporting to be able to report any concerns.

4.2 Due diligence processes

AW Edwards and its suppliers are expected to live up to and adhere to the principles set out in the anti-slavery policy which endeavours to reflect UN Guiding Principles 15 and 17 and demonstrate progress towards the standards set out in it.


AW Edwards' procurement practices require that all new suppliers are subject to an appropriate level of screening for modern slavery risks. AW Edwards' ultimate parent company, Bouygues Construction S.A, has a framework agreement with an external provider who can perform on-site CSR performance evaluation of AW Edwards' supply chain for high risk items or high-risk countries. The scope of the screening AW Edwards or the external provider performs depends on the nature of the goods or services being procured, but can include financial checks, data security assessments, reference checks, obtaining copies of relevant supplier's policies and procedures and on-site inspections including interviews with a supplier's employees.

AW Edwards' standard form Subcontractor Interview Checklist and Invitation to Tender:

- includes questions about adherence with the Act (through an extensive modern slavery risk self-assessment questionnaire) and commitment to addressing modern slavery and human trafficking;
- requires that each Subcontractor publishes a modern slavery statement (if required by law); and
- requires any labour hire companies that AW Edwards engage to provide their licence pursuant to any applicable labour hire licensing scheme,

with failure to comply with any of the above resulting in disqualification from AW Edwards' supply chain.

AW Edwards' site teams hold meetings with its subcontractors, suppliers and consultants during which labour standards, health and safety, payment and performance issues are discussed. This allows AW Edwards to continuously monitor the performance of its supply chain and act promptly when their performance falls below the required standards. AW Edwards meeting with its key supply chain is another way in which their performance is assessed and compliance with AW Edwards' contractual requirements such as the Charter, Modern Slavery requirements and Health and Safety policies is reviewed. ⁵


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4.3 Risk assessment, management and remediation

Section 3 above sets out the areas of AW Edwards' procurement activity where there could be a higher risk of slavery or human trafficking taking place.

AW Edwards has a procurement team for each major project that assesses and manages the procurement of high value and/or high-risk goods and services in accordance with AW Edwards' procurement practices and formal tendering procedures.

AW Edwards also employs a team of lawyers and has a compliance officer to ensure compliance with its legal and ethical obligations.

AW Edwards has in place appropriate processes for reporting concerns within the business. A statement has been made by AW Edwards' CEO asking all staff to be vigilant in workplaces in respect of potential labour exploitation and to report anything giving rise to a suspicion in this area.

AW Edwards has a contract suite that includes clauses requiring compliance with the Act and any applicable labour hire licensing scheme, with such clauses included in all of its contracts with suppliers, subcontractors and service providers. These clauses permit AW Edwards to terminate for non-remediation of a breach of these anti-slavery obligations by a supply chain member.

AW Edwards is putting risk mapping of its supply chain into place. It has created a risk mapping methodology and is able to reach out to its parent and sister companies within the wider Bouygues Group for their risk mapping reports in order to start piecing together a global picture of ethical, including modern slavery, risks within the supply chain.

AW Edwards monitors potential suppliers that do not comply with anti-slavery practices to ensure they are not used by AW Edwards unless and until their practices are improved and comply, where required, with the Act.

4.4 Training in relation to slavery and human trafficking

AW Edwards has provided slavery and human trafficking awareness training for key individuals in its business (executive leadership team and key figures from the procurement and HR department).

AW Edwards has also organised an awareness training seminar regarding modern slavery for all of its Project Directors and Contract Administrators in partnership with speakers from the International Justice Mission (IJM), a global organisation that is working towards eliminating the slave trade.

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To further raise awareness of the risks of modern slavery, AW Edwards has an online training module, targeted at all staff, that seeks to raise awareness about ethics and compliance including modern slavery and the identification of risks of modern slavery. During the 2022 reporting period, an updated ethics and compliance training module was implemented, which was mandatory for all AW Edwards employees. This included a segment on modern slavery.

4.5 Evaluating A W Edwards' effectiveness of actions taken

As detailed in Section 3, AW Edwards recognises that some areas of its operations and supply chain are exposed to parts of the industry that could be considered high risk and is committed to undertaking further due diligence of its supply chain over the coming year. To date, AW Edwards has not found any evidence of practices that violate its Anti-Slavery Policy.

AW Edwards will continue to assess the effectiveness of its actions by:

- continuing to enhance its screening processes;
- implementing further ethics and compliance training and awareness, including in relation to modern slavery; and
- gathering feedback from procurement, legal and HR teams to holistically consider trends in any anti-slavery cases reported including through grievance/ whistleblowing/ anti-slavery policy reporting mechanisms.

5. Conclusion

This Statement has been approved by the Directors of AW Edwards Pty Ltd.



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