



A W EDWARDS

SLAVERY AND HUMAN TRAFFICKING STATEMENT CALENDAR YEAR 2021

July 2022

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 (A W Edwards) pursuant to section 13 of the Modern Slavery Act 2018 (Cth) (the Act). A W 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 aims to have a zero-tolerance approach to managing the risk of modern slavery. Its anti-slavery policy reflects its commitment to acting ethically and with integrity in all its business relationships. In July 2018, A W Edwards became a subsidiary of Bouygues Bâtiment International (a French construction company operating in five continents) and part of the Bouygues Group. A W 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.

This Statement sets out what A W Edwards has done in the calendar year 2021 to work towards ensuring that slavery and human trafficking is not taking place in any part of its businesses or supply chains.

2. A W Edwards’ structure, operations and supply chain

A W Edwards is a private limited company that provides building construction services in Australia (predominantly NSW) to public, private, government and institutional clients. A W Edwards is incorporated in Australia and has its headquarters in Northbridge, Sydney. It has around 318 direct employees in Australia. A W Edwards does not own or control any other entities. A W 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 115,000 employees worldwide and operates in approximately 80 countries.

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

- **Subcontracting** – the specialist contractors necessary to deliver certain construction and fit out operations on A W 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, A W 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 A W Edwards’ sites.

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- **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 A W Edwards' core business; and
- **Travel** – A W Edwards works with a number of travel providers such as hotels and airlines.

Generally, the relationships with our suppliers are often short term and changeable.

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

A W Edwards considers it unlikely that A W Edwards would directly cause modern slavery practices, but realises that it may inadvertently contribute to them. Risks have been identified in the following areas of our supply chain:

- Engaging labour hire companies for execution of A W Edwards' projects. We are aware that labour hire companies have been highlighted as a high-risk area for potential exploitation of migrant workers;
- Procuring equipment and specialist machinery from overseas supplier factories for our construction and fit out business. Some of these companies, such as those manufacturing cladding, vertical transportation, mechanical and electrical components, are in countries reported to have a high prevalence of modern slavery by international organisations or NGOs e.g. China.
- Procuring materials, such as cladding, for our building projects. In most cases we endeavour to purchase from Australian suppliers, but if necessary in order to meet a large or urgent order deadline we will procure from overseas suppliers, again usually in China, where we do not have direct insight into labour practices used by material suppliers.
- Procuring staff uniforms and PPE for site workers. We are aware that textiles and clothing is a high risk sector. We purchase uniforms branded with the company logo and PPE from Australia based companies, but do not yet have insight into the working conditions of the various countries the items of clothing and PPE are manufactured in.

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4. Actions taken by A W Edwards to address modern slavery risks

4.1 Policies in relation to modern slavery and human trafficking

A W Edwards has a number of 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 of the following policies can be notified. In particular, the following policies are directly relevant to the subject matter of this Statement:

- **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;
- **Whistleblowing procedure** – this policy encourages employees to bring any bad practice they become aware of to the attention of senior management without fear of repercussions for doing so;
- **Health & Safety policy** – this policy sets out A W 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 A W Edwards' approach to preventing the occurrence of discrimination, harassment, bullying or victimisation in the workplace;
- **Delegations Authority and contract signing procedure** – this policy sets out A W 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; and
- **Anti-slavery policy** – this policy specifically addresses the subject matter of the Act recognising and preventing trafficked, forced, bonded and child labour.

4.2 Due diligence processes

A W 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.

A W Edwards' procurement practices require that all new suppliers are subject to an appropriate level of screening for modern slavery risks. A W 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 A W Edwards' supply chain for high risk items or high-risk countries.

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The scope of the screening A W 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.

Our standard form Subcontractor Interview Checklist and Invitation to Tender includes questions about adherence with the Modern Slavery Act and commitment to addressing modern slavery and human trafficking and requires any labour hire companies that A W Edwards engage to provide their licence pursuant to any applicable Labour Hire Licensing Scheme. Any supply chain applicant (to which the Act applies) which has not published its required modern slavery statement, will not pre-qualify for our supply chain as a result.

4.3 Risk assessment, management and remediation

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

A W 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 A W Edwards' procurement practices and formal tendering procedures.

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

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

A W Edwards has a contract suite that includes clauses requiring compliance with the Modern Slavery Act and any applicable Labour Hire Licensing Scheme in all of its contracts with suppliers, subcontractors and service providers. These template contracts permit A W Edwards to terminate for non-remediation of a breach of these anti-slavery clauses by a supply chain member.

A W 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 modern slavery risks within the supply chain. A W Edwards is keeping a blacklist of any members of its supply chain that do not comply with anti-slavery practices to ensure they are not used again.

4.4 Training in relation to slavery and human trafficking

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

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In 2021, A W Edwards completed 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.

In order to further raise awareness of the risks of modern slavery, A W Edwards has an online training session that seeks to raise awareness about modern slavery that is targeted to be completed by all staff.

4.5 Evaluating A W Edwards' effectiveness of actions taken

A W Edwards recognises that some areas of A W Edwards' 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, A W Edwards has not found any evidence of practices that violate its Anti-Slavery Policy.

A W Edwards is going to assess the effectiveness of its actions by:

- Including a section on modern slavery responses in the Senior Management Review meeting that is held once a year;
- Checking its procurement procedure is being consistently followed every 6 months. If A W Edwards commences new operations in a high-risk country or region, A W Edwards will identify and assess any new modern slavery risks that may result;
- Gathering feedback from procurement, legal and HR teams so that we can holistically consider trends in anti-slavery cases reported through the grievance/ whistleblowing/ anti-slavery policy reporting mechanisms;
- Developing KPIs covering the implementation of modern slavery policies or processes. These will include specific KPIs on the number of modern slavery training sessions and awareness raising slots in staff inductions delivered, the number of contracts entered into that include modern slavery clauses and the number of modern slavery complaints or tip-offs resolved by a grievance/whistleblowing/anti-slavery policy reporting mechanism.

To date, the actions outlined above have not progressed as quickly as anticipated due to the impacts of COVID-19 on the construction industry over the past 2 years.

5. Impact of COVID-19

COVID-19 had limited impact on A W Edwards' capacity to identify and mitigate its modern slavery risks. In particular, on projects such as the Equinix SY9 data centre, the procurement of critical plant, equipment and materials only experienced minor disruption as a consequence of COVID-19.

On the whole, A W Edwards' supply chain remained unchanged during the reporting period with existing relationships maintained. However, A W Edwards anticipates that events stemming from COVID-19 at a sub-supplier level, such as factory shutdowns, changes to supply chain structuring and workforce reductions may have increased the vulnerability of workers in our global supply chain.



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During the reporting period, A W Edwards placed emphasis on implementing COVID-safe practices on sites and within Head Office, inclusive of measures in accordance with the Australian and State Government Public Health Advisories. These measures included sourcing additional safety critical equipment, which is where A W Edwards experienced the greatest impact and disruption, particularly with the procurement of P2 Respirators (which were never mandated at any time on our Projects but procured nevertheless), surgical masks made available for staff in an office environment/site locations, alcohol based hand sanitiser and for some of its Projects freestanding remote temperature-taking stations. This disruption was attributed to the increased demand for these provisions world-wide and the overwhelming shortage of supply. To effectively mitigate this risk and ensure continuity of our project operations, A W Edwards procured these provisions through the Bouygues Construction International procurement desk (DCW based in Hong Kong), who facilitated this procurement for all subsidiaries within the Bouygues Group. A W Edwards did not have any direct contact with these suppliers as they were centrally managed by DCW in accordance with Bouygues Construction Purchasing Policy. A W Edwards is aware that this lack of visibility into what and how its agent in Hong Kong procured the equipment is, on the face of it, a potential modern slavery risk. However, DCW, as with all Bouygues Group entities complies with the Bouygues Group Code of Ethics and has a similar anti-slavery ethos to A W Edwards.

A W Edwards is aware that the restriction on travel has led to some audits being carried out without on-site inspection. This has inevitably limited the depth of assessment reports produced and therefore A W Edwards' ability to assess the effectiveness of our actions to combat modern slavery. To overcome these limitations, A W Edwards earlier this year, embraced new technology that allows virtual tours (in real time) to be undertaken.

6. Conclusion

This Statement was approved by the Executive Committee of A W Edwards Pty Ltd on behalf of A W Edwards on **30 June 2022** who will review and update it as necessary on an annual basis.

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