

## **BBV Area North Modern Slavery Policy**

### **Scope**

Balfour Beatty Vinci Joint Venture ('BBV') is an unincorporated joint venture of the following companies ('BBV parent companies') appointed by HS2 (High Speed Two (HS2) Limited) to design and construct Lots 1 and 2 of the high-speed rail line between London and the West Midlands (a section known as 'Area North'):

- Balfour Beatty Group Limited
- Vinci Construction Grands Projets
- Vinci Construction UK Limited

This Policy outlines the approach taken by BBV to prevent modern slavery and labour exploitation in the delivery of Area North, in accordance with the Modern Slavery Act 2015. Recognising the heightened risk of modern slavery within the UK construction industry, BBV is committed to addressing the root causes of modern slavery and addressing the conditions in which labour exploitation can thrive. Our approach continues to evolve but we strive to follow consistent legal and ethical best practice across Area North and throughout our supply chain.

BBV parent companies have issued Modern Slavery Statements demonstrating their respective commitments to preventing modern slavery and labour exploitation, complying with section 54(1) of the Modern Slavery Act 2015. The intent and principles set out in this Policy align with those of the BBV parent companies and are supported by a commitment to wider ethical and best practice standards.

BBV parent company Modern Slavery Statements and that of our customer HS2, are accessible here:

HS2 – [Modern-Slavery-and-Human-Trafficking-Statement-Corporate-Policy-2025-redacted.pdf](#)

BB - [Balfour Beatty Modern Slavery Statement 2025](#)

VCGP - [FER-PIB-POL-08-7-MSHT-Statement-2025.pdf](#)

VUCUK - [modern-slavery-statement-2025.pdf](#)

### **Defining Modern Slavery**

Modern slavery describes exploitation including but not limited to forced or compulsory labour (including child labour), domestic servitude, sexual exploitation, debt bondage, organ harvesting and other (broader) forms of criminal exploitation where victims are controlled by force, threats, coercion, abduction, fraud and/or deception. For the construction industry, the primary modern slavery risk is the trafficking of humans for labour purposes.

### **Spotting the Signs of Modern Slavery**

The Fair Work Agency ("FWA") (formerly the Gangmasters and Labour Abuse Authority) provides guidance on 'spotting the signs' of modern slavery (labour exploitation specifically). BBV encourages everyone across Area North and its supply chain to be aware of the signs so that instances of modern slavery can be identified and reported quickly, enabling perpetrators to be apprehended and victims safeguarded. Common signs of modern slavery and labour exploitation are:

- **Appearance** – victims may wear the same clothes each day, have unsuitable work clothing (i.e. no PPE or warm clothing) or unexplained/untreated injuries.
- **Restricted freedom** – victims may have no passport or identity documents, limited contact with others, allow others to speak on their behalf or depend on their employer for work, travel and accommodation.
- **Working conditions** – victims may be unable to choose when and where they work, work long hours with no breaks or time off, and may be working in unsafe conditions and have no contract of employment.
- **Finances** – victims may not be paid for work, receive unwanted charges or fines, or may not have access to their money, bank cards or documents.
- **Accommodation** – victims may have no choice where they live, not know their home or work address, rarely leave the workspace or may live in overcrowded or substandard accommodation.
- **Behaviour** – victims may be unfamiliar with the local language, follow instructions from others, allow others to speak on their behalf, have limited or no interaction with others at work or home, or be distrustful of the authorities.

If you are concerned about someone's wellbeing or suspect they may be a victim of modern slavery and labour exploitation, you can contact one of the following with your concerns:

- **BBV Speak Up** - call (0) 808-189-1053 (pin 8109) or visit <https://bbvareanorthspeakup.integrityline.com/>
- **HS2** – email [SpeakOut@hs2.org.uk](mailto:SpeakOut@hs2.org.uk), call 0808 1 96 5847 or use secure web reporting <https://secure.ethicspoint.eu/domain/media/en/gui/107410/index.html>
- **Balfour Beatty** - call 0800 028 0822 or visit [www.balfourbeattyspeakup.com](http://www.balfourbeattyspeakup.com)
- **Vinci** - <https://www.vinci-integrity.com>

In an emergency, where you are in, or you are concerned that someone else is at immediate risk of harm, then call 999 and ask for the Police.

### **What BBV Does to Prevent Modern Slavery**

BBV and its parent companies have a top-level commitment to operating ethically and working to eradicate modern slavery and labour exploitation. We have policies, procedures and contractually enforceable expectations on our supply chain that together help to mitigate the risk of modern slavery incidents on Area North. These include:

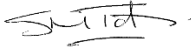
- **The BBV Code of Conduct** – we demonstrate our core values (Safety, Integrity, Respect, and Leadership) through a commitment to all applicable laws and regulations, including those safeguarding human rights. This commitment establishes a culture of transparency and integrity across all levels of Area North so that modern slavery and labour exploitation is not tolerated and if incidents emerge, they are called out quickly so that perpetrators can be held accountable and victims safeguarded.
- **Compliance with HS2’s labour requirements** – we adhere to strict labour requirements set by our customer HS2 and strive to ensure our supply chain does the same. This includes ensuring that the default model for engaging people on Area North is employment under a legally compliant contract of employment, recognising all the usual employment rights with labour standards that meet or exceed best practice, for example the relevant Working Rule Agreement. There are specific contractual and legal obligations on our specialist labour agencies to ensure right to work checks are carried out effectively to meet strict legal obligations and agencies are required to report to BBV on such compliance. BBV and its parent companies carry out statutory right to work checks on people engaged directly on Area North.
- **Procurement and due diligence processes** – our supply chain onboarding and auditing processes aim at ensuring we engage a supply chain that takes modern slavery risk as seriously as we do. We require that all subcontractors working on our sites have, or are in the process of obtaining, Constructionline Gold membership demonstrating they meet the requirements of the Common Assessment Standard (CAS), which includes assessment of modern slavery compliance. In addition, as part of BBV’s pre-qualification requirements and tender evaluations, additional information is sought, for example the production of supplier modern slavery statements, to provide additional assurance of a supplier’s commitment. This is accompanied by an expectation on all suppliers to have strict and thorough right to work checks and modern slavery specific audits in place. To provide ongoing assurance, BBV undertakes a rolling programme of supply chain audits, with suppliers prioritised for audit on a risk sensitive basis for in-depth compliance checking.
- **BBV’s contractual requirements** – once in contract, BBV holds its supply chain to account contractually. BBV’s standard templates (including those used with its labour only subcontractors) include variously obligations to comply with the Modern Slavery Act and related policies, implementation of due diligence on the supplier’s lower tier supply chain including annual audits and sharing audit findings with BBV on request. BBV also requires its supply chain to commit to working in partnership with the FWA where modern slavery incidents are identified.
- **Training** – in addition to training provided by the BBV parent companies, we have incorporated modern slavery awareness and prevention into relevant training modules available on our BBV Digital Skills Academy.
- **Speak Up** – the BBV Speak Up platform provides a secure and confidential way for reporting concerns across Area North including serious allegations like modern slavery. Reporting concerns about modern slavery through Speak Up ensures protection against retaliation for reporting parties. Allegations of modern slavery will be investigated, and appropriate action will be taken. BBV parent companies have their own speak up systems through which modern slavery and labour exploitation concerns can be raised. See above for contact details.

We operate zero tolerance for non-compliance with our modern slavery and wellbeing safeguards; violations will result in disciplinary action against individuals or contractual action against our supply chain.

BBV is committed to raising awareness of modern slavery and labour exploitation, eliminating associated risks, and supporting our colleagues, BBV parent companies, stakeholders, supply chain, and the public wherever we can.

This Policy has immediate effect and replaces all previous policies on this subject issued by BBV on Area North.

**AUTHORISATION**



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**Expires 31 May 2027**



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<https://bbvareanorthspeakup.integrityline.com/>