



# MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

## 1. Introduction

- 1.1 The purpose of the VINCI Construction UK Ltd Modern Slavery and Human Trafficking Policy is to communicate to our employees, customers, suppliers, shareholders, and the communities we serve, our commitment to combatting modern slavery in the construction and facilities management industries.
- 1.2 VINCI Construction UK Ltd is part of the VINCI Group, a global player in concessions and construction. VINCI Construction UK Ltd designs, finances, builds and operates infrastructure and facilities that help improve daily life and mobility for all.
- 1.3 VINCI Construction UK Ltd is a national construction and facilities company. VINCI Construction UK Ltd has strong relationships with other VINCI companies and subsidiaries and, as a result, can leverage ideas, skills and entrepreneurial flair to deliver top-quality work in all sectors.
- 1.4 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 policy.
- 1.5 We are dedicated to ensuring there is transparency in our business and in our approach to combatting modern slavery in all of our operations. We expect the same high standards from all of our subcontractors and suppliers.
- 1.6 Our policy draws upon the VINCI Group's code of ethics and conduct (the "Code"), which underpins our strong values on corporate culture and guide our activities.

## 2. Modern Slavery Act 2015

- 2.1 The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom. It is designed to tackle slavery in the UK and consolidates previous offences relating to trafficking and slavery. The act extends to England and Wales. The bill was introduced to the House of Commons in draft form in October 2013 by James Brokenshire, Parliamentary Under Secretary for Crime and Security. The bill's sponsors in the Home Office were Theresa May and Lord Bates. It received Royal Assent and became law on 26 March 2015.
- 2.2 Section 54 of the UK's Modern Slavery Act 2015 is the transparency in supply chains provision. It requires commercial organisations operating in the UK, with an annual turnover of £36 million or more, to prepare an annual statement on the steps the company has taken, if any, to ensure slavery and human trafficking is not happening in its own business and supply chains. The statement must be approved by the board of directors (or equivalent management body) and signed by a director (or equivalent) and published on the homepage of the website of the commercial organisation (or a link on the homepage to the statement must be provided).
- 2.3 More than 45 million people are estimated to be entrapped in modern slavery across the world. They are deprived of their freedom for the personal or financial gain of their exploiter.
- 2.4 Slavery can take many forms the most common being domestic servitude, sex trafficking, forced labour, bonded labour, child labour and forced marriage.

- 2.5 We fully support the government's objective to eradicate modern slavery and human trafficking.

### 3. About the Policy

- 3.1 This policy applies to all employees, subcontractors and suppliers. Compliance is mandatory.
- 3.2 This policy does not form part of any employee's contract of employment. We may amend it at any time.
- 3.3 You must ensure that you read, understand and comply with this policy. Prevention, detection and reporting of modern slavery is the responsibility of our employees, our subcontractors and our suppliers. You are required to avoid any activity which might suggest or lead to a breach of this policy.
- 3.4 Breaches of policy by employees may result in disciplinary action and in the case of suppliers and subcontractors, may result in contract termination.
- 3.5 If you suspect modern slavery is taking place, have any suspicions or are aware of any breaches to the policy please speak to a member of HR in confidence. Please also refer to the Whistleblowing directive that is within the staff handbook.

### 4. Responsibilities

- 4.1 This policy is governed by the board of directors with full support. Strong involvement and input are provided from procurement and HR.
- 4.2 It is management's responsibility to communicate the expected standards to our employees and ensure that they conduct themselves in an appropriate manner.
- 4.3 This policy shall be reviewed on an annual basis and as and when necessary to reflect changes in relevant legislation.
- 4.4 You are invited to comment on this policy and suggest ways in which it might be improved.

### 5. Communication

- 5.1 VINCI Construction UK Ltd undertakes to ensure that its Modern Slavery and Human Trafficking Policy and those policies which derive from it are communicated effectively to directors, management, employees, subcontractors and suppliers including inductions, noticeboards, staff handbooks and toolbox talks.

- 5.2 Training is a fundamental way of raising awareness and ensuring that all employees, subcontractors and suppliers understand the importance of tackling modern slavery. Training will be provided in a priority order of high to low risk over the next 3 years.
- 5.3 We are committed to delivering an e learning module which will be provided to all employees and will become part of new starter inductions.
- 5.4 The e Learning module will reference, among many things, how all parts of the business can influence purchasing practices which can have an effect on supply chain conditions. A record will be kept on whom has completed the module. It will also reinforce what is ethically right to help encourage employees values, beliefs and attitudes.
- 5.5 Specialist training will be carried out for those employees who may encounter victims directly or work within procurement. This will cover areas such as how to report suspected cases and what actions the company would take.
- 5.6 Guidance is also available from the CIPS website for procurement and also the Supply Chain School.

### 6. Employment

- 6.1 VINCI Construction UK Ltd expects every one of its employees to demonstrate exemplary conduct based on integrity, fairness and respect.
- 6.2 All staff must refrain from behaviour that could involve themselves, other employees or the group in illegal or unfair practices.
- 6.3 We aim to ensure that job requirements and job selection criteria are clear and based only what is required to get the job done effectively. We will avoid making stereotypical assumptions based on protected characteristics about who is able to do a particular job.
- 6.4 We aim to ensure that no job applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage protected groups and which are not justified by the demands of the job.

## 7. Supply Chain

- 7.1 We are committed to working in partnership with our supply chain to tackle modern slavery and human trafficking, and to promoting ethical and sustainable procurement throughout the company and the supply chain.
- 7.2 We expect our supply chain to ensure the products they source comply with ethical standards and that they can offer full transparency.
- 7.3 High risk tier one suppliers will be highlighted from the heat mapping / risk analysis, a strategy will then be formalised as to how and when auditing and further checks are carried out on these supply chain members.
- 7.4 We are also committed to producing a guidance booklet to help all stakeholders understand what is required of them and what help and support can be provided.

## 8. Whistleblowing

- 8.1 The Company believes that good communications amongst workers at all levels promotes better business practice.
- 8.2 The Company will not tolerate wrongdoing by workers at any level.
- 8.3 If a worker has a serious concern, the matter can be reported, without fear of reprisals.
- 8.4 The purpose of this procedure is to enable the Company to investigate and deal properly and sensitively with allegations of wrongdoing, unsafe working environment or practices, raised by workers.

A handwritten signature in black ink, appearing to read "Bruno Dupety".

Bruno Dupety  
Chief Executive  
VINCI Construction UK Ltd