



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT



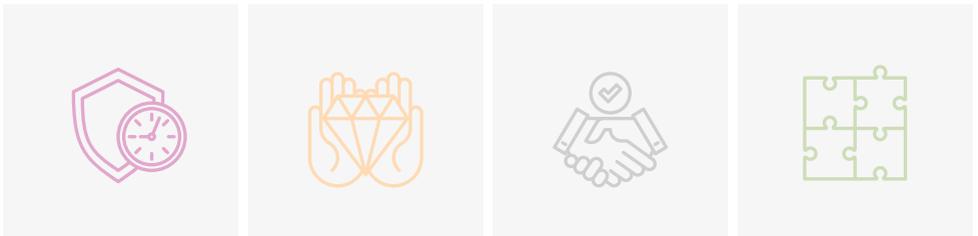
Company Approach

VINCI Construction UK Ltd is part of the VINCI Group, a global player in concessions and construction. We design, finance, build and operate infrastructure and facilities that help improve daily life and mobility for all. 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 high-quality work across all sectors.

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 in our vision and development of our modern slavery statement.

The VINCI Group continue to be a contributing member of the UN Global Compact and takes its responsibility to avoid and mitigate any modern slavery in its operations extremely seriously.

Our approach to modern slavery is governed by our main board, who provide leadership from the top down, continually striving for best practice and leading by example. Our modern slavery policy is communicated to our supply chain, embedded into our sustainable procurement policy and has become part of the way we work.



Our People

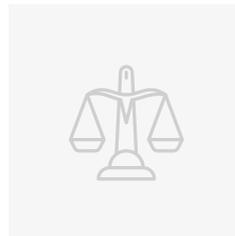
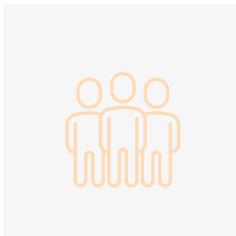
We have in place a number of key policies and documents which explicitly state how we operate as a business in relation to people and the steps taken to ensure that we are a transparent, accessible and inclusive organisation. These policies and documents are reviewed annually and updated to ensure that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

- VINCI Manifesto
- Code of Ethics and Conduct
- Sustainable Procurement
- Corporate Social Responsibility
- Modern Slavery and Trafficking
- Anti-Bribery
- Fairness, Inclusion and Respect
- Recruitment and Selection
- Human Rights
- Supply Chain Charter

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.

As well as internal procedures for direct employees to highlight any concerns they may have, we also provide a confidential reporting service, Safecall, which is available for employees, members of our supply chain and members of the general public. This is a service operated by an independent third party, and is available 24 hours per day, 7 days per week.

In respect of our contingent labour and resource processes, we operate a robust system, working with a consistent number of recruitment agency partners, managed by our resource provider organisation, Datum RPO. We have in place annual reviews and update our contracts with the recruitment agency partners. Each partner and every single temporary worker that have been engaged within our business is audited to ensure compliance with our internal process, expectations and the contract requirements.



Modern Slavery and ISO 20400

In 2017 a working group was formed with representatives from across the VINCI UK businesses to develop a 3-year Modern Slavery strategy. The aim of the strategy was to ensure that we continued to improve our understanding of the risks of modern slavery, set clear targets and measure the success of its implementation year on year.

We have now successfully delivered the strategy and have reported on its success in our yearly Modern Slavery and Human Trafficking Statement. All of the outputs of the strategy are embedded within the business and we will continue to develop, refine and report on them.

To continue to develop our approach to sustainable procurement and Modern Slavery we have aligned our procurement processes to the ISO20400 guidance standard and have been independently assessed against it. As part of this alignment we have introduced a new sustainable procurement policy which sets out our priorities and objectives in relation to Natural, Human and Social capital.

Human Rights and Modern Slavery fall under the Social Capital priority and the objective is to ensure that high risk sector supply chain partners are engaged in Modern Slavery due diligence activity, providing VINCI with an opportunity to increase transparency within the supply chain.

Supply Chain and Business Engagement

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

We have also worked as part of the Supply Chain Sustainability School Modern Slavery Special Interest Group working collaboratively with other main contractors and suppliers to highlight risk areas within our supply chain.

We have worked with the Supply Chain Sustainability School Special Interest Group for Labour Resource. We ensure that the objectives of the 'People Matter Charter' specifically around Modern Slavery are integrated into our processes and those of our Supply Chain.

We have worked with Datum RPO to review our approach to auditing our contingent labour supply chain, introducing a more robust compliance process. As well as company checks this also ensures that every contingent worker that enters site has been vetted and all right to work and identity checks have been carried out thoroughly.

We have also:

- Communicated our statement and sustainable procurement policy to all our internal employees.
- Communicated our statement to our supply chain members
- Communicated our Safecall number to all direct and indirect workers.

Prequalification

We have introduced additional requirements within our prequalification process in relation to Modern Slavery. This process is managed centrally by our compliance team.

We have worked with Build UK and CECA as part of a cross industry body to introduce a 'Common Assessment Standard', which will not only improve efficiency and reduce

cost but will also raise the standard of Stage 1 prequalification, this includes a more robust approach to verifying Modern Slavery understanding and competence within our supply chain.

Moving forward we are working with Constructionline as part of a cross industry group to secure additional information and due diligence from our supply chain across several sustainability topics, including modern slavery. This will ensure that our Pre-qualification process continues to evolve and become more robust.

Understanding our Supply Chain and Heat Mapping

We have worked collaboratively with our Supply Chain to understand the potential risks associated with Modern Slavery within their product category and what contingencies they have put in place to mitigate these risks.

As a result of the heat mapping exercise undertaken over the course of the 3 year strategy, we have now developed an approach which allows us to gather and further analyse information on high risk trades and services, mapping them to our own ethical sourcing standards.

To support our alignment to the ISO20400 guidance standard we have engaged Action Sustainability on a consultative basis to further understand the risk of Modern Slavery within our supply chain so that we can continue to mitigate against it.

We will be working with Action Sustainability during 2021 and 2022 to develop a procurement prioritised heat map identifying key sustainability impacts against spend categories procured by the business. We will then develop a plan for each procurement activity so that the potential impacts are considered and risks addressed.

Training and Development

We continue to promote the Supply Sustainability Chain School's resources on Modern Slavery to our key supply chain partners. We have introduced sustainability training to all of our procurement team and introduced mandatory modules on Modern Slavery and Human Trafficking.

At VINCI Construction UK we believe it is important to support the upskilling of our Supply Chain. We give free access to our VINCI Academy eLearning modules to support supply chain development. In 2021 we will be looking at developing a module on modern slavery risk, this will be mandatory for all employees and available to our supply chain.

Moving Forward

Through our alignment to the ISO 20400 sustainable procurement guidance standard we will continue to embed measures into our processes to combat Modern Slavery and Human Trafficking. The VINCI Construction UK Modern Slavery working group will continue to meet regularly and to push this agenda as well as producing a yearly statement to outline our progress.

We have committed to:

- Improving against the ISO20400 guidance standard for sustainable procurement year on year.
- Continue to improve the due diligence process and vetting of our supply chain in relation to Modern Slavery.
- Deliver a procurement prioritised heat mapping process and risk mitigation measures.
- Look at developing a VINCI Academy Modern Slavery eLearning module.

Review

This statement is made in accordance with Section 54 (1) of the UK Modern Slavery Act 2015 and constitutes VINCI Construction UK Ltd's Modern Slavery Statement for the financial year end 31st December 2020, published June 2021. To bring our statement in line with the our year end our next statement will be published in Jan 2022.



Scott Wardrop

Chief Executive
VINCI Construction UK Limited

This document outlines the Modern Slavery and Human Trafficking Statement for VINCI Construction UK Ltd, VINCI PLC, Conren Ltd, VINCI UK Developments Ltd, VINCI Insurance Services Ltd, Powertest Ltd. This policy applies to all employees employed within the aforementioned operating divisions of VINCI.

EXCELLENCE | **COLLABORATION** | **INNOVATION** | **INTEGRITY** | **DISCIPLINE**

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