



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Company Approach

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.

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.

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 statement.

The VINCI Group is a contributing member of the UN Global Compact and takes its responsibility to avoid and mitigate any modern slavery in its operations extremely seriously. To that end we have developed a detailed policy and strategy that run over 3 years to support this statement. Our approach to modern slavery will be governed by our main board, who will provide leadership from the top down, continually striving for best practice and leading by example. Ultimately our modern slavery policy will be communicated to our supply chain, embedded into our procurement policy and will become a part of the way we work.

Our People

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

These policies include:

- Code of Ethics and Conduct
- Corporate Social Responsibility
- Anti Bribery
- VINCI Manifesto
- Equality
- Recruitment and Selection
- Whistleblowing

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 accessible to employees for them to highlight any concerns they may have, we also provide a confidential whistleblowing 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, Safecall, and is available 24 hours per day, 7 days per week.

All reports received are treated seriously and are dealt with in line with the process outlined within the Whistleblowing Policy.

In respect of our contingent labour and resource processes, we operate a robust system, working with a consistent number of recruitment agency partners, to fulfil our contingent workforce requirements. We have in place annual reviews and update 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:

Supply Chain

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

In developing our strategy and policy in relation to modern slavery, VINCI Construction UK Ltd has taken the following steps:

1. Created and lead a Modern Slavery Working Group, with members from different disciplines and various parts of the UK businesses within the VINCI Group.
2. Started recording information relating to modern slavery during the prequalification process.
3. Communicated its policy and statement to internal employees.
4. Communicated its policy and statement to its supply chain.
5. Communicated its Safecall number to all direct and indirect workers.

Our policy and 3-year modern slavery strategy have been developed by the dedicated Modern Slavery Working Group. We also work closely with the Supply Chain Sustainability School and work cooperatively with our peers to identify modern slavery risk within our supply chains as part of this process.

As is detailed in our 3 year strategy, some of the key actions we have delivered are:

What we have done - Year 1

Prequalification:

- Since 2014 we have mandated that our supply chain must be registered and verified by Constructionline. As part of their 2015 pre-qualification review we have introduced additional questions around Modern Slavery and Human Trafficking into their process.
- We have also worked with BUILD UK, as part of the prequalification reform, to introduce questions in the stage 1 prequalification process regarding Modern Slavery and Human Trafficking and are working to apply a common assessment standard to this question set.

Heat mapping:

- We worked as part of the Supply Chain Sustainability School Modern Slavery special interest group to work collaboratively with other main contractors and suppliers to highlight risk areas within our supply chain.
- We have also identified high risk areas within our own supply chain and will look to deliver training and development in these areas in year 2 of our strategy.

Training and development:

- All supply chain and purchasing staff have undertaken and passed eLearning training on Modern Slavery and Human Trafficking.
- We have promoted the Supply Chain Schools resources to our key supply chain.

Terms and conditions:

- We have incorporated clauses on modern slavery into our standard contractual terms with subcontractors.

What are we going to do – Year 2

Prequalification:

- We will continue to support BUILD UK with the pre-qualification reform to introduce a standardised question set and method of assessment that will include modern slavery criteria.

Heat Mapping:

- We will utilise the result of the heat-mapping exercises to deliver training to high risk suppliers and contractors where required.

Training and Development:

- We will also roll out training on modern slavery to all staff through our Academy eLearning portal.
- We will make our Academy eLearning module available to our Supply Chain.

Terms and conditions:

- We will continue to develop clauses on modern slavery in our other standard contractual terms.

We will report on the success of the above actions in our 2019 statement as well as set the objectives for the following year.

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 2017.



Bruno Dupety
Chief Executive
VINCI Construction UK Ltd