

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

// Company Approach

VINCI asserts that sustainable economic success is intrinsically linked to an ambitious human project, whereby success is assessed equally in terms of our contribution to economic, social and societal development, and the integration of our projects into local communities. By signing up for the UN Global Compact in 2003, VINCI acknowledged its ethical and social responsibilities for its employees, customers, suppliers, shareholders and local communities.

VINCI Construction Grands Projets is part of the VINCI Group of companies, one of the largest global built environment organisations with more than 183,000 employees worldwide. Being part of the same group lends itself to collaborative working, following similar procedures and having access to a global resource in terms of people, equipment, technology and common suppliers.

All group companies share a mutual Code of Ethics and Conduct. This code is delivered by the Chairman 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.

With over 7,000 employees operating in 28 different countries, VINCI Construction Grands Projets takes its responsibility to avoid and mitigate any occurrence of modern slavery and human trafficking practices within its operations. VINCI Construction Grands Projets has developed a strategy that runs over 3 years to support this statement. Our approach to modern slavery shall be governed by our main board who shall provide leadership from the top down, continually striving for best practice and leading by example. In accordance with this approach, we will make sure to develop and continuously implement robust processes in our operations and in collaboration with our local partners.

// 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 regularly and updated to ensure that ongoing opportunities for improvement are identified and acted upon. These policies include:

- **VINCI Code of Ethics and Conduct;**
- **VINCI Manifesto Together;**
- **VINCI Corporate Social Responsibility;**
- **VINCI Guide on Human Rights;**
- **VINCI Construction Grands Projets Mobility and Recruitment** process;
- **VINCI Construction Grands Projets UK Code of Conduct** policy, including Anti-Bribery/Corruption and Whistleblowing policies;
- **VINCI Construction Grands Projets UK Equal Opportunities** policy; and
- **VINCI Construction Grands Projets and VCGP UK Welcome Booklets.**

In collaboration with our JV Partners / local partners, Right to Work and Pre-Employment checks are carried out on employees joining our projects and this includes the employee being able to provide evidence that they are in possession of their own identification documents. Any discrepancies identified are investigated thoroughly and appropriate actions taken.

Internal procedures are available to our employees in order for them to raise any concerns that they may have. All reports received are treated seriously and are dealt with in accordance with the process as outlined in the Whistleblowing section of the VINCI Construction Grands Projets UK Welcome Booklet.

// Our Supply Chain

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

VINCI's Subcontractors Relations Guidelines clearly sets out principles for establishing partnership-based, balanced and respectful relations with subcontracting companies.

VINCI Construction Grands Projets also expects that its supply chain takes rigorous steps so as to ensure that the wellbeing and human rights of their workforce are in line with VINCI's standards. These expectations are clearly codified and enforced through the **VINCI Suppliers' Global Performance Commitment Code**.

In developing VINCI Construction Grands Projets' strategy and policy in relation to modern slavery, the following steps are taken:

1. Involvement in the Modern Slavery Working Group, with members from different disciplines and various parts of the UK businesses within the VINCI Group.

2. Development of a VINCI Construction Grands Projets

3 years Action Plan: to maintain VINCI Construction Grands Projets' compliance with VINCI's reference guides and international standards in terms of human rights, VINCI Construction Grands Projets has set up a 3 year Sustainable Development Action Plan consisting of the following key actions:

- a. Ensure that VINCI's Subcontractors Relations Guidelines are circulated within the company and understood by all;
- b. Analyse direct and indirect exposure associated with the risk of breaching fundamental social rights and local population rights, including human trafficking and modern slavery in all our activities. We will launch a series of targeted initial audits, each of which covering the key elements defined in **VINCI's Guide on Human Rights**, such as labour migration and recruitment practices, working conditions, living conditions and human rights practices in the value chain;
- c. Introduce specific references to human rights-related issues as part of the tendering and contractual process with our supply chain;
- d. Develop mechanisms and take reasonable steps to ensure modern slavery or human trafficking is not taking place in our supply chain. This will be carried out through targeted internal audits with the support of our JV partners / local partners; and
- e. Develop appropriate training and guidance information for our direct employees. Policy Review

// Policy Review

This statement is made in accordance with Section 54 (1) of the UK Modern Slavery Act 2015 and constitutes VINCI Construction Grands Projets' Modern Slavery Statement for the financial year end 31st December 2017.

Patrick Béchaux
Human Resources Director
VINCI Construction Grands Projets

