



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. 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 of developing 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. To that end we have developed a detailed policy and strategy that runs 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
- Supply Chain Code of Conduct
- 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, 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, 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.

Supply Chain and Business Engagement

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
6. Members of the Modern Slavery Working Group, work 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

As is detailed in our 3 year strategy, below are our actions completed during our 2nd Year and our commitments for year 3:-

What we have done - Year 2

Prequalification

We have worked collaboratively with Build UK and CECA as part of a cross industry cross 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 competence and understanding within our supply chain.

Heat mapping

As a result of the heat mapping exercise undertaken in year 1 of the 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.

Training and development

We continue to promote the Supply Chain Schools resources on Modern Slavery to our key supply chain partners.

What are we going to do – Year 3

Broaden the number of internal staff (Project Management and Commercial Staff) completing and passing the Supply Chain Sustainability School Modern Slavery e-learning module.

Work with the Supply Chain Sustainability School to benchmark our supply chain with respect to understanding Modern Slavery and Human Trafficking in high risk areas and where applicable set improvement targets.

Ensure that VINCI are aligned with the Build UK Common Assessment Standard Prequalification.

Develop, publish and fully communicate to both internal and external stakeholders the 'Supply Chain Code of Conduct' this will ensure that our supply chain are aligned to our requirements and fully understand their obligations in relation to Modern Slavery.

Create a working group of supply chain and procurement professionals and associated stakeholders to ensure that VINCI Construction UK Ltd align its procurement processes to ISO 20400 – Sustainable Procurement Guidance Standard.

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

Working with the Supply Chain Sustainability School Special Interest Group for Labour Resource, we will 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 will report on the success of the above actions in our 2019/20 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 2018.



Bruno Dupety

Chief Executive
VINCI Construction UK Ltd

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.