

# 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. Since 2003, 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.

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.

VINCI Construction Grands Projets (The Company) is part of the VINCI Group. With over 8,000 employees operating in more than 35 different countries, we design and build major infrastructure projects that help improve daily life and mobility for local communities. 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. VINCI Construction Grands Projets 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.

The Company takes its responsibility to avoid and mitigate any occurrence of modern slavery and human trafficking practices within its operations. Our approach to modern slavery shall be governed by our main executive 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 and supply chain.

### // Our People

We have in place several key policies and documents 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 and documents are reviewed regularly and updated to ensure that ongoing opportunities for improvement are identified and acted upon. These policies include:

- **VINCI Manifesto Together;**
- **VINCI Code of Ethics and Conduct;**
- **VINCI Corporate Social Responsibility;**
- **VINCI Guide on Human Rights;**
- **VINCI Raising the Alarm** guidance;
- **VINCI Subcontractors Relations Guidelines;**
- **VINCI All around performance of purchasing partners;**
- **VCGP Ethics and Anti-Corruption Policy;**
- **VCGP Modern Slavery and Human Trafficking Statement;**
- **VCGP Human Rights** process;
- **VCGP UK Equality Diversity and Inclusion Policy;** and
- **VCGP UK Whistleblowing Policy.**

In collaboration with our JVs and local partners in the UK, we carry out Right to Work and Pre-Employment checks on every employee joining our projects. 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 actions taken.

Internal procedures are available to our direct employees for them to raise any concerns they may have. All reports received are treated seriously and are dealt with in accordance with the processes outlined in the policies and documents above.

### // 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.

The **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 its supply chain to take rigorous steps to ensure that the wellbeing and human rights of their own workforce are in line with VINCI's standards. These expectations are clearly codified and enforced through the **VINCI Suppliers' Global Performance Commitment Code**.

## // Actions on Our Supply Chain and Our People

### /// Communication

- ❖ The present **Modern Slavery and Human Trafficking Statement** is communicated to all our internal employees and supply chain members to demonstrate the level of compliance VINCI Construction Grands Projets expects from its suppliers.

### /// Company Process and Standards

- ❖ Our VINCI Requirements, including **VINCI Human Rights Guide**, have been integrated in our "Company" and "Standard Projects" **Process Approach Mapping**:
  - Human rights requirements are now embedded into our Human Resources management systems and are in line with International Labour Organization's standards. This includes accommodation and living standards, as well as local staff recruitment and management processes.
  - We have established a Human Rights process within our management system. Its objective is to ensure our projects compliance with the rules set out in the VINCI Guide on Human Rights.
  - The company has also integrated Human Rights compliance requirements and checks as part of the Tendering, Selection and Management of our Suppliers and Subcontractors.
- ❖ VINCI Construction Major Projects has created a Sustainable Procurement Working Group with the mission to deliver recommendations and training material to align our procurement processes with the ISO20400 guidance standards.

### /// Compliance Monitoring

- ❖ Global Human Rights Risk/Heat Mapping: We have partnered with Business for Social Responsibility, a global non-profit organisation, to map the countries in which we operate according to their risk level ("Low", "Medium" and "High") and rank them by order of vulnerability.
- ❖ We carry out targeted audits on higher risks projects and developed specific action plans to eliminate or reduce the risk of breaching fundamental social rights, including human trafficking and modern slavery, in our direct or indirect practices (supply chain). These audits are carried out in line with the **VINCI's Guide on Human Rights** and include checks on subcontractors' labour rights, their labour migration and recruitment practices, working and living conditions, accommodation, labour interviews.
- ❖ Considering the broad range of requirements and activities the Company may face around the world, and to widen our compliance monitoring capabilities, Human Rights Targeted Audits Grids have been made available on a dedicated intranet website, to allow our employees to undertake their own self-assessments.
- ❖ VINCI Construction Grands Projets' Executive Committee is regularly monitoring 50 performance indicators in relation to human rights. The projects and members of the supply chain that are being audited must all meet a minimum score to be deemed compliant to VINCI's standards.

### /// Prequalification and Selection

- ❖ As part of our prequalification and tendering process, specific Human Rights and Modern Slavery requirements are submitted to our supply chain.
- ❖ A contractual clause is integrated into our supply chain standard contracts, setting our Human Rights standards, and giving VINCI Construction Grands Projets the authority to carry out supply chain compliance checks during prequalification and contractual phases. Any breach of the obligations set in this Ethics and Compliance clause shall constitute a material breach of the supplier contract.
- ❖ Our internal project selection committee includes specific Key Performance Indicators in relation to Human Rights as part of our selection process.

recognises our ongoing commitment to responsible governance, human rights and fair business practices.

### /// Training and Awareness

- ❖ A mandatory e-learning training course on Human Rights has been developed and is available to all on the company online training platform: **Human Rights - platform UPI**. This module forms part of the onboarding process for all new employees. The attendance of our new and existing employees is regularly monitored against the 100% target.
- ❖ A specific Human Rights training module is included into our **“Team Grand Projets”** training, targeting the senior managers of the organisation. The aim is to raise our managers’ awareness and commit them to consider Corporate Social Responsibility matters, including Human Rights, into their day-to-day management activities.
- ❖ We continue to promote the **Supply Sustainability Chain School’s** resources on Modern Slavery to our internal employees and key supply chain partners.

### /// Raising the Alarm

- ❖ A whistleblowing mechanism has been established for direct employees and members of the supply chain to report anonymously any malpractices they may witness. Raising the alarm can be done anonymously via the online platform **VINCI Integrity**: <https://www.vinci-integrity.com>.

## // Moving Forward

### /// Communication

- ❖ In 2025, we will continue to communicate successive updates of our **Modern Slavery and Human Trafficking Statement** to all our internal employees and members of our supply chain.

### /// Company Process and Standards

- ❖ We will continue to maintain VINCI Construction Grands Projets’ compliance against VINCI’s Human Rights Standards and ILO International Standards.
- ❖ We will continue to embed measures into our procurement processes to combat Modern Slavery and Human Trafficking.
- ❖ In March 2025, we obtained the “CSR Committed” label at the “Confirmed” level, following an independent assessment. This certification also

### /// Prequalification and Selection

- ❖ In 2025, we will maintain compliance with **Constructionline’s Social Value questionnaires** to enhance the due diligence of our supply chain across several sustainability topics, including modern slavery. This will ensure that our prequalification process continues to evolve and become more robust on our projects.
- ❖ Continued compliance from our supply chain will be monitored using the **Constructionline’s Risk Radar** and **Social Value Radar**.

### /// Training and Awareness

- ❖ In addition to continuing the promotion of our VINCI Human Rights e-learning module, we will introduce and enforce Responsible Procurement training to our new and existing employees. This is part of the expected output from the VINCI Construction Major Projects Working Sustainable Procurement Group.
- ❖ We are also developing a specific 2-hour awareness training for our tendering teams.

## // 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 31<sup>st</sup> December 2024.

It provides details of our policies, processes, and the efforts we have taken in 2024 to further strengthen our approach against modern slavery and to reduce the likelihood of any malpractice occurring within our organisation and our supply chain. It also sets out the steps we will take in 2025 and beyond, to further strengthen our approach.

**Etienne RENARD**  
**Human Resources Director**  
**VINCI Construction Grands**

23<sup>rd</sup> May 2025

*Etienne RENARD*

