



# MODERN SLAVERY STATEMENT

## Company Approach

We are the UK division of VINCI Construction and ultimately part of VINCI, a global player in concessions and construction, which design, finance, build and operate infrastructure and facilities that help improve daily life and mobility for all.

VINCI Construction Holding Limited, to which this policy applies, has five core operating businesses, namely Eurovia, Ringway, Taylor Woodrow, VINCI Building and VINCI Facilities, all operating in the built environment and priding ourselves on a strong partnership culture.

VINCI Construction Holding Limited 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.

VINCI SA has a code of ethics and conduct, the principles of the code of ethics and conduct are reflected in our vision and development of our modern slavery statement. The 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
- Social Value
- Anti-Bribery
- Fairness, Inclusion and Respect
- Recruitment and Selection
- Human Rights

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, supported by our managed service provider. 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 Construction business in the UK, 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 are continuing to align our procurement processes to the ISO20400 guidance standard. As part of this alignment, we have introduced a new sustainable procurement policy which sets out our priorities and objectives in relation to Natural (Environment), Human (Economic) and Social capitals.

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 and mitigate risk 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 ensure that the objectives of the 'People Matter Charter' specifically around Modern Slavery are being integrated into our processes and those of our key Supply Chain.

We have worked with our managed service provider 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 prequalification, this includes a more robust approach to verifying Modern Slavery understanding and competence within our supply chain. We will continue to align to the Build UK CAS where appropriate.

Moving forward we will be reviewing our Prequalification process and working to secure additional information and due diligence from our supply chain across several sustainability topics, including modern slavery.

## 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.

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.

During 2022 we have developed procurement prioritised heat maps identifying key sustainability impacts against spend categories procured by the business.

During 2023 we will develop a plan for each procurement activity so that the potential impacts are considered, and risks addressed.

## Learning and Development

We continue to work with external partners to promote open access learning resources to train and develop not only direct employees but also our wider supply chain.

At the start of 2022 we launched a bespoke Modern Slavery eLearning module, with the aim of ensuring we continued to improve our understanding of the risks of modern slavery and set clear targets.

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 2023 we will be promoting our module on modern slavery risk to our supply chain that have been designated as 'high risk' for modern slavery through our heatmapping process.

## 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. Our VINCI Construction Modern Slavery working group in the UK, will continue to meet regularly and to push this agenda as well as producing a yearly statement to outline our progress.

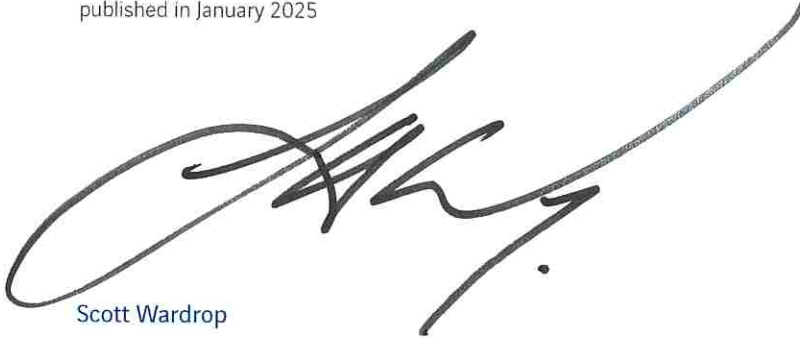
We have committed to

- 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 development plans, incorporating modern slavery, against the procurement prioritised heat maps.
- Implement a Supply Chain Code of Conduct.
- Deliver a Responsible Sourcing Policy.
- Continue to roll out the VINCI Modern Slavery eLearning module to our staff and our supply chain.
- Introduce a Modern Slavery working group as part on the Supply Chain Pivot club, to ensure consistency across our UK operations.
- Engaging with an external consultant to undertake a full review of our process in relation to the management of Modern Slavery risk



## Review

This statement is made in accordance with Section 54 (1) of the UK Modern Slavery Act 2015 and constitutes VINCI Construction Holding Limited Modern Slavery Statement for the financial year 31st December 2024 published January 2024. Our next statement will be published in January 2025



**Scott Wardrop**

Chief Executive  
VINCI Construction Holding Limited

*This policy applies to all delegations within the UK Division of VINCI Construction*