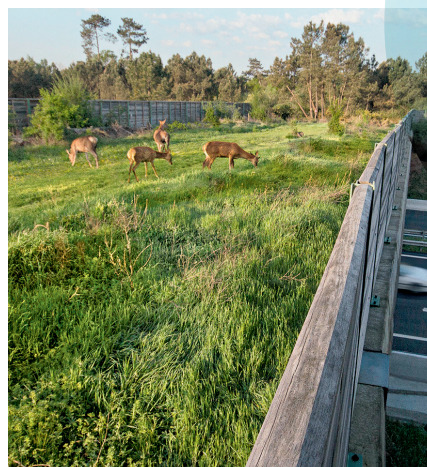




FORGING A SUSTAINABLE WORLD



SUPPORTING ALL-ROUND PERFORMANCE



VINCI, because its infrastructure has a major impact on cities, regions and their citizens, aims for technical, economic, environmental and social performance in a long-term relationship with all its stakeholders.

VINCI Manifesto and its all-round performance commitments

► As a global company and leader in its sector, VINCI must lead by example and aims for all-round performance. Because its projects serve the public interest, VINCI strongly emphasises listening and dialogue with its stakeholders in all its business lines. In response to the major challenges facing the world today, VINCI aims to be a force for good by contributing to the development of attractive cities, efficient transport infrastructure and modern work spaces without compromising the environment.

► This vision is outlined in the VINCI Manifesto, which sets out the values shared by all employees and lays down the Group's sustainable development commitments to all its stakeholders. Published in some 30 languages, the Manifesto forms a bond between all of VINCI's businesses and aims to coordinate how its operational entities and their teams act in all countries where it operates.



Decentralised implementation

► The Group has adopted a decentralised structure based on a network of subsidiaries operating autonomously. This structure requires a high level of accountability from managers and their teams, as they are best placed to identify local issues and problems, as well as the most appropriate solutions. In line with this structure, each entity is responsible – within a common framework set down by the Group – for establishing its own all-round performance targets in light of its businesses and local issues.

Specific governance

► At the highest level, VINCI's Board of Directors' Strategy and CSR Committee is responsible for social, environmental and ethical issues, and for ensuring that these issues are integrated into the Group's strategy (*see page 151*).

The Human Resources Department, through its Social Responsibility Department, is in charge of social and workforce-related policy; the Environment Department is responsible for environmental policy, and the Ethics and Vigilance Department for ethics policy under the authority of the Chairman and CEO. The Human Rights, Environment and Ethics and Vigilance committees meet regularly with the representatives of the business lines to identify major issues and implement vigilance practices to prevent human and environmental risks, and to promote the dissemination of measures and best practices.



Integration of sustainable development issues

◆ VINCI closely tracks and analyses the key trends liable to impact its businesses in the short, medium and long term. The main issues are the environmental emergency, social and workforce expectations, urbanisation, mobility and digital transition. These shifts may involve risks, but they also provide opportunities, in particular for the development of eco-efficient solutions. They are central to the work of VINCI's entities focused on foresight analysis (*see page 19*). The executive bodies and business lines also ensure they include these issues in the policies they implement.

◆ The main environmental, social and ethical ambitions are briefly addressed in the following pages. The policies and action plans for each area are detailed in the non-financial performance statement (*see pages 184 to 243*) and the duty of vigilance plan (*see pages 244 to 269*).

Trends and issues impacting VINCI's businesses

MAIN TRENDS	ANALYSIS AND ISSUES
ENVIRONMENTAL EMERGENCY	According to international benchmark scenarios, climate change risks having a profound effect on today's lifestyles. There is also growing pressure on natural resources and the environment, at times beyond their capacity to regenerate or adapt.
SOCIAL AND WORKFORCE EXPECTATIONS	Given social inequality and crises, measures to protect employees, to promote inclusion and integration for all, to improve human rights in value chains, to ensure compliance with ethical principles and to maintain regional social cohesion have now become crucial.
URBANISATION	In 2030, 60% of the world's population will be living in cities, mostly in developing countries. Citizens increasingly want to be involved in development projects.
MOBILITY	Given today's rampant urbanisation, demographic and social changes and the climate emergency, sustainable mobility must be created reflecting emerging new needs and a range of uses.
DIGITAL TRANSITION	Data mining, artificial intelligence and new technologies bring new solutions for the Group's projects while protecting personal data.

IMPLEMENTING THE GROUP'S ENVIRONMENTAL AMBITION

Forging a more sustainable world by accelerating the transformation of living environments, infrastructure and mobility.



Higher ambition and deeper commitments

Responding to the climate emergency, VINCI is acting faster to reduce its impact, transform its businesses and create innovative solutions as part of its ambitious new commitments. This ambition concerns all levels in the Group and involves employees, clients, users and suppliers. Partnerships are developed with external stakeholders in this same aim. The integrated design-build-operate approach helps reduce

environmental impact at each stage in a project's life cycle.

In line with the environmental commitment expressed in its Manifesto, in early 2020, VINCI recast its 2030 environmental ambition by pledging to develop solutions that contribute to improving the living environment and mobility, while managing and reducing the direct impact of its businesses. These goals cover three areas: climate change, the circular economy and natural environments.

2030 AMBITION

REDUCE DIRECT
GREENHOUSE GAS
EMISSIONS

40%

REDUCTION IN
GREENHOUSE GAS
EMISSIONS

90%

LOW-CARBON
CONCRETE USED
BY VINCI
CONSTRUCTION

2050 AMBITION

NET ZERO
GREENHOUSE GAS
EMISSIONS

2020 KEY FIGURES



17%

OF ELECTRICITY
CONSUMED IN 2020
IS FROM
RENEWABLE
SOURCES

10%

REDUCTION IN
GREENHOUSE GAS
EMISSIONS
(SCOPES 1 AND 2)
RESTATED FOR
THE IMPACT
OF ACQUISITIONS
IN 2020 VS. 2018

Act for the climate

VINCI is taking action to reduce its greenhouse gas emissions in line with the commitments of the Paris Climate Agreement to limit global warming to less than 2°C by the end of the century. As a consequence, the Group aims to reduce its direct emissions by 40% by 2030 (against its 2018 baseline). For concessions, the target is a 50% reduction for the same period.

Group entities are mobilising their teams and bringing out their potential for innovation to reduce the impact of their own businesses at the same time as the carbon footprint of projects undertaken and managed for their clients and local authorities.

In response to this need, VINCI is reassessing all its production and operation methods and equipment. The action plans currently being rolled out at Group level and within each business line, together with indicators to measure progress, unite employees, stakeholders and the users of buildings and infrastructure managed by VINCI in reducing both direct and indirect emissions simultaneously.



VINCI'S COMMITMENTS FOR 2030

Reduce its direct greenhouse gas emissions (Scopes 1 and 2) by 40% by 2030 compared with the 2018 levels.

Reduce its indirect emissions by taking action across the value chain of the Group's activities.

Adapt structures and activities to improve their climate change



◆ VINCI continues its research, development and foresight analysis on its path towards achieving carbon neutrality and net zero greenhouse gas emissions by 2050.

◆ Lastly, to adapt to the consequences of climate change, a working group reflecting the full scope of VINCI's expertise has been created at the Leonard innovation platform to address resilience. The aim is to increasingly incorporate resilience into projects, structures and solutions.

Optimise resources thanks to the circular economy

◆ In response to the growing scarcity of natural resources – some of which are essential for its businesses to operate – VINCI is committed to limiting the footprint of its businesses by integrating them into the circular economy. To achieve this target, the Group is improving its design and production processes, reducing the extraction of virgin raw materials, and promoting



VINCI'S COMMITMENTS FOR 2030

- ◆ Improve sorting to ensure systematic waste recovery.
- ◆ Promote construction techniques and materials that use fewer natural resources.
- ◆ Limit the extraction of primary raw materials in favour of recycled materials.

reuse and more efficient techniques and behaviour.

◆ Working to enhance sourcing processes at sector level naturally fits with improving waste management, as Group companies operate in industries that are among the biggest waste producers. VINCI will also advance the circular economy by developing innovative solutions, in particular producing recycled materials and recycling its own waste and waste generated by its users.

2030 AMBITION

DOUBLE
THE PERCENTAGE
OF RECYCLED
MATERIALS
PRODUCED BY
EUROVIA

**ZERO
WASTE**
TO LANDFILL FROM
ALL CONCESSIONS

2020 KEY FIGURES



12 MILLION
TONNES OF
RECYCLED
AGGREGATE MIX
OUT OF EUROVIA'S
TOTAL ANNUAL
PRODUCTION (80 MT)

54%
OF WASTE
RECOVERED BY
INFRASTRUCTURE
UNDER CONCESSION
IN 2020



**MORE THAN
90%**
OF TIMBER
USED BY WOOD
CONSTRUCTION
SUBSIDIARIES FROM
PEFC- OR FSC-
CERTIFIED
SUSTAINABLE
FORESTS IN 2020

Preserve natural environments

◆ VINCI aims to reduce its impact on natural environments by aligning its businesses on long-term ecological challenges. The Group is accelerating the rollout of its ecological engineering expertise across all its businesses, to ensure that they can give more consideration to biodiversity and natural environments in all their operations and for projects of any size. To protect water resources, VINCI addresses needs at the local level and promotes innovative hydraulic infrastructure and water treatment processes. Governance, the sharing of best practices, and partnerships with ecological institutions and organisations are being improved to contribute to the Group's progress. As part of some projects, its companies are also developing comprehensive ecological engineering solutions and alternative versions that are better for natural environments.

◆ In June 2020, VINCI joined the act4nature international initiative, further deepening its commitment to preserving biodiversity.



VINCI'S COMMITMENTS FOR 2030

- ◆ Prevent pollution and incidents by systematically implementing an environmental management plan at all business lines.
- ◆ Optimise water consumption, especially in areas of water stress.
- ◆ Aim to achieve no net loss of biodiversity.

Develop environmentally valuable offers and solutions

► In addition to reducing their environmental impact, Group companies are developing solutions to help their customers reduce their own footprint. These include VINCI Autoroutes' low-carbon motorway project to accelerate the growth of carbon-free mobility over long distances; Eurovia's Granulat+ programme to increase the percentage of recycled materials used, a programme which is growing into new geographies; the development of ecological engineering services and the use of low-carbon concretes meeting Exegy standards at VINCI Construction sites; the energy performance or renewable energy contracts offered by VINCI Energies; and VINCI Airports' systematic proposal to regulatory authorities of modulated airport tax charges based on the environmental performance of aircraft. As part of its new environmental ambition, VINCI is stepping up the development of offers combining economic and environmental value by integrating this concept as the focus of the work led by its innovation centres.

► Externally, VINCI contributes to improving knowledge and disseminating best practices in its industry, bringing its partners and suppliers onboard to fast-track the development of environmental solutions in line with its own commitments. The VINCI-ParisTech lab recherche environnement supports this approach by fostering interaction between research and applications at the operational level.

Raise employee and customer awareness

► 2020 saw the operational rollout of the Group's new

2030 AMBITION

ACT4NATURE
INTERNATIONAL
COMMITMENTS

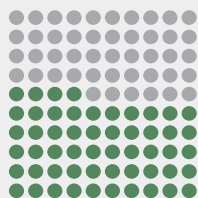
AIM TO ACHIEVE
NO NET LOSS
OF BIODIVERSITY

2020 KEY FIGURES

MORE THAN
50
LOCAL
PARTNERSHIPS IN
FRANCE FOR
BIODIVERSITY
CONSERVATION
ACTIONS AT
QUARRIES

32 AIRPORTS
CONSOLIDATED BY
VINCI AIRPORTS USE
**ZERO PHYTO-
SANITARY**
PRODUCTS

€3.5 BN
OF REVENUE
GENERATED
COVERED BY AN
ENVIRONMENTAL
LABEL IN 2020



26%
MORE HOURS OF
TRAINING DEVOTED TO
THE ENVIRONMENT



environmental ambition. To garner its teams' support for these goals, VINCI held its first Environment Day on 22 September, creating the opportunity for employees from all businesses and in all countries to share knowledge. With the same aim in mind, VINCI introduced its first Environment Awards, a major internal competition open to all employees. It will run from 2020 to 2021, first at the regional level before moving on to the Group level. The aim is to recognise environmental initiatives and best practices implemented in the field, while also fostering their dissemination throughout the various entities. At the same time, training was extended with an e-learning course about the Group's environmental challenges and commitments, together with modules added to VINCI entities' training programmes.

► VINCI companies also work to raise the awareness of their customers. Initiatives include campaigns led annually by concession companies to encourage users to sort their waste at motorway rest areas and in airports, and more broadly to adopt more eco-responsible behaviour.



ENCOURAGING INCLUSIVE GROWTH

Promoting inclusive growth by being a responsible employer and partnering regional growth.

Health crisis management and solidarity

Right from the beginning of the coronavirus crisis, VINCI committed fully to providing support for its employees and stakeholders. Its teams' engagement and the agility of its decentralised organisation meant appropriate measures were rapidly rolled out to protect employees' health and ensure uninterrupted operations and services for clients and users. For example, VINCI companies helped create field hospitals, facilitated health transport through their airports and rail lines, and provided hot meals for truck drivers at their motorway rest areas.

Social dialogue was crucial throughout this period. The Group Works Council met frequently to encourage dialogue and keep the whistleblowing system functioning, report measures taken by business lines, and define adapted prevention programmes. Social dialogue played a key role in determining procedures for resuming activity at worksites.

An exceptional €10 million budget was allocated to the Fondation VINCI pour la Cité in France and to the network of foundations abroad to support front-line workers in hospitals,

healthcare, social services and schools during the Covid-19 crisis. This financial support was backed by over 600 employees who selected and sponsored 758 non-profits. In France, the VINCI Solidarity platform was created to make it easier for employees to get involved and help organise solidarity and social actions.

At the same time, the network of 15 Group foundations continued their involvement in non-profits working to combat exclusion and to strengthen social ties. In all, they supported 432 projects in 2020, sponsored by almost 1,000 employees. Civic initiatives in the Group's business lines, divisions and companies round out this social engagement.

Strong local roots

VINCI companies are firmly rooted in their regions. They contribute to the growth of economic activity, employment and tax take. An in-depth study in 2018 measured their socio-economic contribution in France. It confirms the considerable role VINCI plays in many sectors, beyond just those directly linked to its businesses. And the value created has had a balanced impact across all regions. VINCI companies use this information to develop their strategy for building ties with local regions. A new study based on 2020 data will be conducted in 2021. This study also reveals that almost all Group purchases in France were made on the domestic market, including a large share from small and medium enterprises. Priority is on working with local suppliers and subcontractors to make a lasting and inclusive contribution to regional growth. This sourcing strategy aligns smoothly with the responsible purchasing policy. Consistent

€10 MILLION
IN EXCEPTIONAL AID
GRANTED TO THE
FONDATION VINCI
POUR LA CITÉ FOR
COVID-19 CRISIS
MANAGEMENT



MORE THAN 50%
OF PURCHASES
MADE WITH SMALL
AND MEDIUM
ENTERPRISES



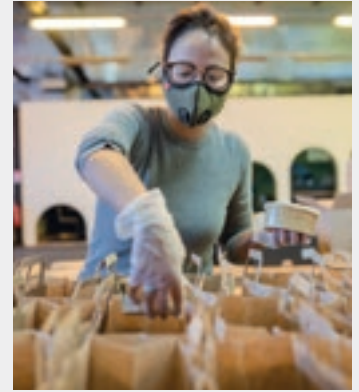
ALMOST ALL
PURCHASES FOR
FRENCH
OPERATIONS MADE
ON THE DOMESTIC
MARKET



**PROPORTION OF WOMEN
MANAGERS**

2019
20.3%

2020
21.1%



with the Group's commitments, this policy is based on identifying risks, considering non-financial criteria in purchasing decisions, and supporting suppliers and subcontractors in their social and environmental practices.

Diversity and integration

As part of its Manifesto commitments, VINCI seeks to promote equal opportunity and prevent all forms of discrimination in its businesses. To ensure the practical application of this policy, the Group has created a network of diversity representatives totalling some 400 employees. In 2020, they concentrated on two key topics: risks of exclusion and opportunities for inclusion created by the crisis; and range of sexual orientations and gender identities as part of the 15th VINCI Diversity Days.

The commitment to promoting gender balance – especially in management – was strengthened. The ratio of women managers was 21.1% in 2020 (23.7% in France), an increase of 6 percentage points in 10 years (15.1% in 2010). VINCI has set a target to increase the percentage of women reaching management positions through hiring or promotion to 28% by 2023. The measures to promote gender balance in management committees were renewed and extended, lifting the target percentage of women on management committees to almost 17%, which equates to appointing a minimum of four women each year at a constant scope.



VINCI rolls out its gender equality index methodology internationally to provide all its companies with a common tool for assessing equal pay and potential for development. The Group is also active in initiatives to encourage current and future female students to pursue professions in VINCI's areas of business, through its partnership with the organisation Elles Bougent. Almost 700 employees in France and internationally are engaged in actions to remove gender bias in the Group's business sectors and professions.

► In France the Trajeo'h programme has supported 826 people with a disability (nearly 5,000 since 2014) into a new career path either within or outside the Group. In addition to redeploying and hiring employees with disabilities (191 people with a disability supported in 2020), Group companies subcontracted work to the sheltered sector around the world, awarding total revenue of €7 million.

► Training in inclusive management continued in 2020, in particular with the self-assessment platform used to determine the company's resistance to the risk of discrimination. New content was loaded onto this platform for use outside France, which is available for example in English and Portuguese.

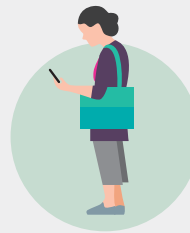
Social and professional integration

► VINCI also seeks to hire the long-term unemployed, in particular through its ViE social enterprise structure, which manages over a million integration hours annually in France. ViE uses an innovative approach to map transferable skills and capabilities for social and solidarity economy organisations and target populations who need genuine support in finding a job.

► An unprecedented approach is also being trialled under a programme designed and funded by VINCI called Give Me Five. Introduced in France in 2018, the programme targets five areas of action: guidance, individual support, integration, employability and apprenticeships. One of the aims in partnership with the French Ministry of Education is to host several thousand middle school students each year from underprivileged areas for internships in Group companies. In the 2019-2020 school year through to the first lockdown in mid-March, over 1,000 middle school students from 34 schools were given the opportunity to spend five days learning about the Group's businesses and worksites, meeting employees and taking part in educational workshops.

► To allow this programme to continue and enable remote learning during lockdowns,

ALMOST
2 MILLION
INTEGRATION
HOURS
IN THE GROUP



GIVE ME FIVE
PROGRAMME:
OVER
3,000
MIDDLE
SCHOOL
STUDENTS
HOSTED BY
END-2020



1,600
TABLETS AND
COMPUTERS
DISTRIBUTED



equipment was donated last April in partnership with Lille, Lyon and Créteil regional departments of education benefiting 31 middle schools. Five hundred tablets, 300 computers, and 300 4G dongles were delivered to these schools for distribution to the families identified by the school head. In partnership with non-profit organisations, the Fondation VINCI pour la Cité participated in similar efforts by distributing 800 computers and tablets to young people from priority neighbourhoods. A personalised support programme for middle school students was launched in September in three pilot regions in partnership with the non-profits Viens voir mon taf, Institut Télémaque, Crée ton avenir and Unis-Cité. By the end of the year, 575 students from seven schools in Lille had taken part the programme.

► Lastly, to assist with learning, VINCI launched the creation of a platform where students, schools and Group companies can connect.

Sustainable employability and employer appeal

► VINCI is committed to building attractive, long-term careers. This is expressed through the VINCI employer brand promise, "You will enjoy working with us". The Group aims to offer current and future employees a range of opportunities to express the full spectrum of their human qualities in a managerial environment that promotes inclusion, independence and responsibility.

► In 2020, Group employees had access to 3.5 million hours of training. An e-learning platform includes all the training content available in Group companies. An artificial intelligence tool combined with professional guidelines, initially trialled by VINCI Autoroutes, was rolled

out by VINCI Construction in 2020 with a view to supporting sustainable employability. The system matches employee skills with the positions available in the company.

■ In all countries where VINCI operates, its companies form partnerships with vocational training and higher education establishments by helping build career paths for students. For example, in France, VINCI has a five-year partnership with the Foundation of the National Institutes of Applied Sciences (Insa), through which it supports a model for a humanistic approach to engineering embraced by this network of schools.

Redistribution systems

■ VINCI is attentive to sharing the benefits of its performance with its employees, which it does through employee savings and incentive and profit-sharing plans. The employee share ownership plan together with an employer contribution scheme encouraging more modest savings was extended to include four new countries in 2020. At the end of 2020, nearly 170,000 current and former employees, in France and internationally, collectively owned nearly 9% of VINCI's share capital, making them the Group's largest shareholder.

Respect for human rights

■ In all countries where it operates, VINCI has a responsibility to prevent risks of human rights violations. The Group pays particular attention to five areas: recruitment practices and labour migration; working conditions; accommodation conditions; subcontractor and temporary employment agency practices; and relations with local communities. For each of these areas, guidelines have



16 HOURS
OF TRAINING
ON AVERAGE
PER EMPLOYEE

€448 M
PAID OUT TO
EMPLOYEES
THROUGH
EMPLOYER
CONTRIBUTIONS
AND EMPLOYEE
PROFIT-SHARING,
INCENTIVE AND
RETIREMENT
SAVINGS PLANS



**MORE THAN
17,000**
EMPLOYEES
COVERED BY
HUMAN RIGHTS
ASSESSMENTS
AT GROUP
SUBSIDIARIES IN
26 COUNTRIES



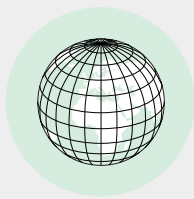
been included in VINCI's Guide on Human Rights, available in 24 languages. This document applies to all VINCI businesses and locations. Additional tools are available to help identify risks aligned with actual operating conditions. Since 2018, 67 subsidiaries have undergone a specific assessment of their human rights practices covering over 17,000 people in 26 countries.

■ VINCI also focuses on ensuring there are no risks of human rights breaches throughout its supply chain. In France, after two years of pilot projects, VINCI Construction France has extended its social risk management policy to all its regional divisions. It has also contracted an independent organisation to audit the labour practices at its major construction sites in the Greater Paris area. This programme is now being rolled out to other Group businesses and sites.

■ In Qatar, 2020 saw the final stage in a pilot project led by the subsidiary QDVC with the International Labour Organisation (ILO). The purpose is to improve recruitment practices for migrant workers. An independent study on a sample of 333 workers showed that they could be hired without having to pay intermediary fees, and that the prevention and complaint processing mechanisms that had been implemented were operational.

■ Lastly, VINCI regularly discusses its human rights policy

with its multiple stakeholders (employee representatives, employees, investors, students, NGOs, research centres, etc.). For the third time, the Group took part in the Workforce Disclosure Initiative's survey of companies asking them to share key information about the labour force and their subcontracting and supply chains. VINCI achieved a transparency score well above the average for its sector.



GUARANTEEING SAFETY

The zero-accidents objective for all people working on our construction and operation sites remains the number-one priority for the Group.

Promoting a safety culture

Due to the nature of its business activities, guaranteeing health and safety for its employees is an absolute priority for VINCI. Achieving zero accidents remains VINCI's main goal in this area. Central to the Manifesto and reaffirmed in the statement on Occupational Health and Safety, the Group focuses on creating a true safety culture from the highest executive levels down to managers and site teams. This goal applies to all individuals – employees, temporary staff or subcontractors – working on a VINCI construction or operating site, as well as customers of managed infrastructure.

The Group's health and safety policy is overarching and aims to anticipate and prevent all occupational risks in this area, as well as psychosocial risks. It also aims to ensure quality of life in the workplace and the redeployment of employees who have suffered a workplace accident or occupational illness.

Governance

At the Group level and under the Executive Committee's authority, this policy is managed by the health and safety

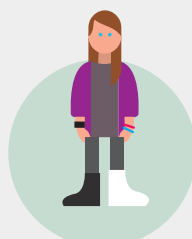


coordination team, which brings together the heads of health and safety networks in all the business lines. The accident prevention Pivot Clubs and internal collaborative platforms help disseminate and monitor health and safety measures for the community of health and safety coordinators and experts.

In the field, the accident prevention programme is managed by a network of over 2,500 health and safety employees. The Group companies implement strict procedures and multiple systems to ensure their employees' safety: upstream risk analysis, circulation of safety guidelines, 15-minute safety sessions that bring together all individuals involved at a worksite, reporting and analysis of near misses and accidents to identify their root causes, training tailored to the industry, type of worksite and operational context.

VINCI's health and safety policy is implemented under the direct responsibility of managers, who are in charge of fostering a safety culture day to day. They receive regular training in safety management, and their practices are assessed. Employee representatives also play a key role in risk prevention, as health and safety are crucial issues in social dialogue.

LOST-TIME WORKPLACE ACCIDENT FREQUENCY RATE



2015

7.08

2020

5.32

NUMBER OF HOURS IN HEALTH AND SAFETY TRAINING



2020

1,308,431

Subcontracting and customer awareness

When VINCI companies act as the programme manager or general contractor, safety is a defining criterion when selecting partners. Accident prevention is a prerequisite included in relations with subcontractors, especially by sharing guidelines and best practices that often go beyond regulatory requirements.

Accident prevention operations also target the customers of infrastructure managed by the Group. The VINCI Autoroutes Foundation for Responsible Driving conducts actions year-round to improve awareness of responsible driving and the risks associated with drowsiness at the wheel, which is the leading cause of motorway fatalities.

Health crisis management

In the exceptional context of the health crisis, these same principles were applied to adapt work organisation and operating methods within the Group's companies. The entire safety network was – and remains – at the ready to define and implement appropriate measures in consultation with the staff, representative bodies, national authorities and professional organisations. To facilitate the rollout of these measures, focus has been on information and training in these new prevention measures and procedures, while reiterating the need to remain vigilant around conventional risks. Special Covid representatives were designated at all workplaces and construction sites. Psychological help lines were created to provide support for employees throughout this unprecedented crisis.



RESPECTING ETHICAL PRINCIPLES

VINCI has adopted a stronger framework so that all its employees can contribute effectively to the Group's integrity and transparency requirements.

Ethics and compliance

► Ethics is at the heart of all VINCI's business relations with its stakeholders. The Group expects the highest standards of conduct from each employee based on a sense of honesty, loyalty, respect for dignity and individual rights. This commitment is reflected at the highest level in the Group.

► The Code of Ethics and Conduct lays down all the principles of business ethics that apply in all circumstances, in all countries where the Group operates and to all companies and their employees. It is used in tandem with the Anti-corruption Code of Conduct, which details the rules concerning the prevention of all acts of corruption, notably identifying risks in business processes and defining conduct to be avoided.

► These two documents are available in 30 languages on the Group intranet and website. They can therefore be accessed by almost 100% of employees in the official language of their country and are included in the new employee welcome kit. The Group's 28,000 key managers have undertaken to comply with them and ensure they are applied within the scope of their responsibility.

Training and information

► To enable all employees to contribute effectively to preventing and detecting acts of corruption, at the level of their responsibility, specific training programmes have been developed and deployed at all levels in the organisation. These modules complement the general e-learning training courses on the Group platform, such as the Anticorruption – Challenges and Risks, and Conflicts of Interest courses.

Partners and subcontractors

► The integrity and transparency requirement does not just apply to Group companies and employees, but also to its partners and subcontractors. In addition to their technical expertise and ability to fulfil their duties, subcontractors are also assessed for their own commitment to respecting human rights and business ethics.

VINCI Integrity

► The online whistleblowing platform called VINCI Integrity is available in five languages on the Group intranet and website. This system enables employees and stakeholders to report any inappropriate behaviour in the areas of human rights, business ethics, environmental risks, and health and safety. It guarantees full traceability and anonymity.

Governance

► The Ethics and Vigilance Department reports to the Chairman and CEO. Working closely with the business line departments, corporate functions and the Group's Ethics and Vigilance Committee, and relying on both internal expertise (Legal, Audit, Human Resources and Information Systems departments, Ethics and Compliance Club, GDPR steering



EMPLOYEES TRAINED IN CORRUPTION PREVENTION AND DETECTION



2020
22,000

committee and Human Rights steering committee) and external expertise, it coordinates the implementation of the prevention system.

► The Ethics and Vigilance Committee has seven members, five of whom are also members of the VINCI Executive Committee. It is responsible for implementing and updating compliance systems covered by the Code of Ethics and Conduct, notably concerning the detection and prevention of acts of corruption and preventing serious breaches of human rights and basic freedoms, and the health and safety of people and the environment, attributable to the Group's businesses. It oversees changes to the Code of Ethics and Conduct and the Anti-corruption Code of Conduct.



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