



FORGING A SUSTAINABLE WORLD



4. Duty of vigilance plan

This section of the Universal Registration Document aims to satisfy the requirements of Law 2017-399 on the duty of vigilance of parent companies and subcontracting companies to identify risks and prevent severe impacts on human rights and fundamental freedoms, on people's health and safety and on the environment, resulting from the activities of the company, those of its subsidiaries or those of the subcontractors or suppliers with whom they have an established business relationship.

4.1 The Group's organisation, business activities and value chain

The objective of VINCI is all-round performance, which is economic and financial performance while safeguarding people and the environment. This is the only possible vision for a company whose activities and constructions are designed for the long term and have a major impact on regions and local communities. Improving local living environments is a goal shared by all the companies of the Group, which therefore:

- contribute to projects in the public interest that benefit local populations;
- proactively offer innovative solutions that best meet the needs of customers and the society;
- work collaboratively by engaging all stakeholders around a common project.

Due to the very nature and diversity of its businesses and activities, VINCI is first and foremost a multi-local Group. Regardless of whether its companies develop construction projects or infrastructure concessions, they establish local operations and produce locally with mainly local management, partners and staff, for local use in local conditions. VINCI is made up of a network of companies, often small or medium-sized, that have long-established roots in their operating regions and that strive to contribute positively to their development. Conscious of its commitments, the Group strives to stimulate local entrepreneurship and maximise the positive impacts of its projects.

At 31 December 2020

1,587 companies, of which **67%** have fewer than **100** employees

270,555 worksites and projects in 2020

217,731 staff worldwide in nearly **120** countries



75.8%
Europe
(46.3% in France)

11.7%
Americas

6.9%
Africa

3.6%
Asia and the
Middle East

2%
Oceania

85%
in OECD
countries

Group entities frequently undertake project-based work. This means that they provide services over periods ranging from a few weeks to a few years, for projects of varying sizes and natures. They work with a variety of partners and subcontractors, also for varying periods of time. When Group entities are the subcontracting company, they may undertake projects involving anywhere from a few to a few thousand workers, in different geographical areas. As subcontractors, they often work with customers with widely ranging requirements and priorities regarding environmental, employment and social issues. Consequently, each project has its own ecosystem. For this reason, any prevention or mitigation action taken must be targeted and adapted to address specific operational, environmental, employment and social issues.

Another feature of construction projects and infrastructure concessions is the fact that operations are often highly integrated, meaning that a significant portion of the supply chain operates on VINCI sites. Subcontractors and temporary workers of all levels work directly alongside the Group's teams at its worksites or sites under operation. Due to this situation, the subcontractor supply chain is closely monitored and subject to the same rules as the direct workers. Given the cyclical nature of the Group's business activities, subcontractors and temporary employment agencies fulfil an essential role and account for a significantly high volume of purchases. Accordingly, they have been given a high priority among the areas for improvement addressed in VINCI's duty of vigilance plan. The Group's other purchases (the main categories of which include materials, such as concrete and bitumen, and purchased or leased worksite equipment) are also, by nature, mainly local and often part of a short supply chain. They are gradually being incorporated into the Group's duty of vigilance plan (see paragraph 2.2, "Relations with suppliers and subcontractors", page 210).

35%
of purchases are
subcontracting purchases

Whatever the business activities or projects of VINCI companies, and regardless of whether their customers are public (such as public or local authorities or government-owned companies) or private (such as property developers or other private-sector companies), VINCI's companies invariably serve customers who order the design or construction of infrastructure or who delegate its management, maintenance and operation. VINCI companies perform their work under contract and report continuously on their activity to their customers and, in some cases, to the inspection bodies and regulators in charge of project monitoring and inspection. In an intensely competitive industry, VINCI companies not only meet the requirements set by customers, but also strive to spread best practices and promote innovation, including in social and environmental matters, while complying with applicable laws and the Group's commitments. Projects undertaken on behalf of public authorities increasingly include social and environmental obligations that are reported on and verified on a regular basis. Lastly, Group companies operate within a value chain involving a large number of players (architects, design firms, engineers, regulators, inspectors, investors, lenders, partners, government and local authorities, etc.) in addition to its customers. Since Group companies do not necessarily act as contracting authorities, they are not always in a position to choose which service providers, techniques and supplies are employed.

VINCI takes all of these parameters into account in designing and implementing vigilance measures that are relevant and effective with regard to its organisation, business activities and value chain.

4.2 Duty of vigilance governance

VINCI's duty of vigilance plan encompasses all entities controlled by VINCI as defined in Article L.233-3 of the French Commercial Code. It builds on the commitments in the VINCI Manifesto, the Group's of Ethics and Conduct and, more broadly, Group policies that help prevent risks to people and the environment by promoting vigilance measures in the three areas covered by the duty of vigilance law.

Vigilance measures and their implementation in each of these areas – people's health and safety, human rights and the environment – are supervised by distinct governance structures.

• Health and safety governance

The Group's health and safety policy, reinforced by a joint declaration of essential actions concerning occupational health and safety (www.vinci.com/vinci.nsf/en/item/essential-and-fundamental-actions-concerning-occupational-health-and-safety.htm), is supervised by the Health and Safety Coordination unit, under the authority of the VINCI Executive Committee. Signed by the Chairman and CEO of VINCI and the Secretary of the European Works Council, the declaration sets a reference framework for the Group by identifying essential and fundamental occupational health and safety actions for all business units, activities and countries combined.

The health and safety directors of the Group's business lines are all members of the Coordination unit, and they ensure that VINCI's policies are effectively disseminated to all of its companies and businesses activities. The unit's mission is to build a shared safety culture, mainly by facilitating the sharing of best practices and feedback among business units, assessing existing procedures, providing reliable indicators and suggesting improvements adapted to each activity. Accident prevention Pivot Clubs and internal collaboration platforms help spread and monitor initiatives among the community of health and safety officers, coordinators and experts. A worldwide network of more than 2,500 employees in Group health and safety roles supports all these measures.

In 2020, the Health and Safety Coordination unit met three times. Its members were briefed on each significant accident or incident in each business line, and discussed human resources needs in health and safety, among other matters. The Coordination unit also continued its work to identify and prevent major risks. Using VINCI's innovation and foresight platform, Leonard, it launched support for innovations that improve health and safety at work.

Health and safety policy is presented to the Board of Directors' Strategy and CSR Committee each year. In early 2020, each business line presented its health and safety policy and the 2019 results to VINCI's Executive Committee. Health and safety also holds a central place in the Group's social dialogue. It is a permanent item on the agenda of every Group Works Council or European Works Council meeting, along with the presentation of indicators – the number of fatal accidents, frequency rates and severity rates – for each geographical area and business unit.

• Human rights governance

The Group's human rights risk prevention policy is communicated in VINCI's Guide on Human Rights, which forms the backbone of its work in this area (www.vinci.com/vinci.nsf/en/item/guide-on-human-rights.htm). The Group has set up an organisation and procedures to coordinate and monitor measures and thereby ensure that its commitments and principles are being cascaded to VINCI entities, their projects and their workites.

VINCI champions human rights issues at its highest echelon. In 2019, the Chairman and CEO confirmed the Group's commitment to raise the bar on respect for human rights and embed them in its corporate culture by signing the French version of the CEO Guide to Human Rights, published by the World Business Council for Sustainable Development (WBCSD), along with nine other French top executives (https://docs.wbcsd.org/2020/10/WBCSD_CEO_Guide_to_Human_Rights.pdf).

Human rights policy is coordinated by the director of the Human Resources Department, who is a member of VINCI's Executive Committee, and promoted throughout the Group by a Human Rights Steering Committee, comprised of the human resources directors of all business lines and divisions. As VINCI's management is highly decentralised, this steering committee has existed since 2015 to facilitate decision-making, discussion and collaboration among the Group's business lines and divisions. Members keep their respective management committees informed and are in charge of disseminating and rolling out policy in their respective business lines and divisions. At every meeting, the steering committee assesses the progress made regarding the human rights component of the duty of vigilance plan. The teams working in the field to ensure the respect of human rights are primarily the Group's human resources professionals, as well as its operational managers, who occupy key roles in the Group's organisation and uphold the Group's commitments inside companies and projects.

The implementation of human rights policy is coordinated by the Corporate Social Responsibility Department, reporting to the Human Resources Department, which helps business lines and divisions to incorporate and implement Group measures, develops and updates risk-mapping and assessment tools, conducts assessments, builds awareness among management committees and employees, and communicates with Purchasing, Internal Control, Ethics and Vigilance, Security, Health and Safety Coordination and other departments. The team is in frequent contact with external stakeholders involved in human rights to address identified issues, answer questions and provide further information about the measures taken in the Group.

The Group Human Resources Director and the Corporate Social Responsibility Director present the human rights policy implementation to the Board of Directors' Strategy and CSR Committee each year. The committee met in November 2020.

• Environmental governance

VINCI's environmental issues are managed at the Group's highest level of responsibility by the Board of Directors' Strategy and CSR Committee, which ensures their integration into the Group's strategy. In 2019, awareness of the climate emergency and the environment became more acute at the Group's top echelon, leading to the definition of a new environmental ambition involving all VINCI entities for the 2020-2030 period. The ambition targets three areas: climate change, the circular economy and natural environments. The Environment Department coordinates its implementation in the various entities and each year it reports twice to the Executive Committee and three times to the European Works Council, which chose the environment as its special focus for 2020. The Environment Department chairs monthly meetings of the Environmental Committee, whose members are the environmental managers and directors of the Group's business lines, and coordinates the environmental network of more than 750 correspondents.

The Group's Environment Department shapes the environmental component of the duty of vigilance plan, based on the environmental goals shared by VINCI's business lines and entities in the three targeted areas. Duty of vigilance measures relating to the environment are integrated and monitored by each entity, in accordance with the Group's decentralised structure, so that they are closely aligned with local realities. Group initiatives draw from measures and processes that VINCI companies have already been implementing for many years to avoid or reduce the environmental impacts of their activities in the countries where they operate. In this manner, the Group's entities define their own risk prevention procedures for their activities. More specifically, they build environmental policies that align with the Group's new environmental ambition, implement environmental management systems and develop internal environmental standards and labels.

In subsidiaries, chief executives and senior management are in charge of ensuring regulatory compliance and the implementation of risk prevention procedures for their operational scope, taking into account their specific activities and challenges. They are assisted by the network of environmental correspondents, who provide environmental expertise.

The environmental component of the duty of vigilance plan was presented to the European Works Council and discussed by its members in November 2019. On 6 November 2020, Xavier Huillard, Chairman and CEO of VINCI, and Roberto Migliardi, Secretary of VINCI's European Works Council, signed VINCI's Environmental Guidelines (<https://www.vinci.com/publi/manifeste/dir-env-2020-11-en.pdf>). This document provides a framework for reducing environmental impacts and risks associated with the Group's activities. It applies to all Group companies, so that VINCI's environmental actions can be improved and adapted to local realities. All subsidiaries are responsible for ensuring that corresponding actions are also taken by subcontractors and joint contractors throughout projects.

• Overall duty of vigilance governance

The Ethics and Vigilance Department provides support in implementing the Group's compliance procedures, in particular with regard to the Code of Ethics and Conduct. The department, which reports to the Group's Executive Management, was created on 1 January 2018 (see paragraph 2.4, "Business ethics").

Implementation of the duty of vigilance plan is regularly reviewed by the Ethics and Vigilance Committee. This seven-member committee includes five Executive Committee members and ensures that the compliance procedures covered by the Code of Ethics and Conduct are diffused and amended as necessary. These include procedures relating to the fight against corruption and the prevention of severe impacts on human rights and fundamental freedoms, on people's health and safety and on the environment, resulting from the Group's activities. The committee meets at least once every quarter and met four times in 2020. It reports annually on its activity to the Board of Directors' Strategy and CSR Committee.

• European Works Council involvement

In 2020, the members of the European Works Council and their deputies continued to regularly discuss the duty of vigilance plan. They met a total of three times in 2020, twice as part of the Council's CSR Committee meeting. After focusing on the environment in 2020, the Council began a new cycle at the end of the year, working with the CSR Committee on a range of corporate social responsibility issues. These included human rights, the duty of vigilance plan and social risk management in subcontracting.

European Works Council members were asked to provide feedback on the plan and its content, particularly the identified risks. The three components of the duty of vigilance plan were therefore presented for the second year in a row. Syndex, a consulting firm that exclusively serves employee representatives, also met with the members to train them on the content of the French duty of vigilance law and provide assistance in reviewing VINCI's plan. Feedback on the plan's content was positive. The European Works Council members decided to continue this dialogue and meet quarterly, starting in 2021. They also asked for the duty of vigilance plan to be presented in each country in the future.

4.3 Duty of vigilance with regard to health and safety

As its activities carry inherent risks, VINCI has made health and safety at work a priority. The Group's health and safety policy aims to anticipate and prevent risks in this area, including psychosocial risks, but also to ensure hygiene, health, safety and quality of life in the workplace as well as to ensure the redeployment of employees who have suffered a workplace accident or illness. The Group also aims to achieve zero accidents, which applies to employees, temporary workers and external staff at VINCI worksites or sites operated by VINCI. This goal is one of the key commitments published in the VINCI Manifesto in 2012. Due to continually changing jobs, tools, techniques, processes and new technologies, constant vigilance is needed. Therefore, VINCI not only applies rules and procedures, but also calls for the continuous development of a safety culture for all that addresses all types of risk to people's health and safety and is shared at all levels of the organisation.

In 2020, VINCI's health and safety network mobilised extensive efforts to manage the health crisis. The measures taken are described in this duty of vigilance plan on page 251 and in detail in paragraph 1.2, "Health, safety and security of employees, temporary staff and subcontractors", pages 190 to 193.

4.3.1 Mapping of the Group's major risks

• Identification and ranking of VINCI's main health and safety issues

A targeted approach, based on the business activity and country, has always been fundamental in identifying and preventing risks to people's health and safety. Each business line and division maps its major risks based on its operational experience, to implement prevention measures aligned with its specific activities and contexts. A health and safety risk analysis is conducted ahead of any work situation, taking into account the work environment, the characteristics of the work being considered and its technical specificities. These multiple levels of analysis are essential to developing responses tailored to the operational issues of each project, activity and country. The Institut pour une Culture de Sécurité Industrielle (ICSI) assisted VINCI in 2018 in mapping major risks at Group level. ICSI interviewed the health and safety directors of VINCI business lines and divisions over several months to identify the major risks inherent to their respective businesses and analyse the elements of managing these risks. The risk map revealed the most common major risks shared by the Group's activities.

• VINCI's main issues

This work resulted in the identification of six main risk categories and various types of potentially major events, which range from events affecting the entire Group to events specific to the activities of particular business lines and divisions. The Health and Safety Coordination unit identifies major risks by combining an assessment of the (actual or potential) likelihood of an event and the (actual or potential) severity of its outcome. A major risk is therefore the risk that a major event occurs and has severe consequences for a subject (employee, temporary worker, subcontractor or third party). Severity level is determined based on situations and events that have actually occurred as well as those that were potentially serious, meaning that in slightly different circumstances, the consequences could have been major. These main categories of risks to people's health and safety are presented in the table below.

Main risk categories	Types of potentially major event
Risks related to moving masses	Collision with moving equipment or materials
	Collision with worksite machines or vehicles
	Collision with third-party vehicles
Risks relating to falling objects or loads	Blows from falling objects or materials
	Blows from the collapse of a civil engineering structure
	Crushing from the fall of a suspended load
Risks relating to working at height	Falling from heights
	Electrocution
Risks relating to energised or pressure equipment	Projection of high-pressure fluids
	Projection of pressure machinery parts
Risks relating to handheld mechanical tools	Cuts and punctures from sharp handheld mechanical tools
Risks relating to road traffic	Road accidents

4.3.2 Measures to assess the situation of subsidiaries, subcontractors and suppliers

Business lines and divisions develop their own prevention policies that are adapted to their activities and geographical and operational environments. These policies rely on rules that should enable all foreseeable situations to be planned for, as well as on the ability of individuals and teams to use their experience and training to manage unexpected events. The policies are implemented as locally as possible, so that any situation that arises can be handled in the most effective way. The established procedures make no distinction between employees of Group companies and temporary or subcontractor staff: at a given site, all active personnel work in the same conditions. Specific action plans and audit schedules support these policies, which are monitored by line management superiors and the network of health and safety officers. Safety inspections and audits carried out by operational teams and safety officers, whether of VINCI's entities and employees or of worksites operated by external companies (whether or not they belong to the Group), are an essential part of this policy. The Group is also expanding the practice of cross-auditing by its various companies and is placing strong emphasis on the importance of managers' involvement in effectively implementing health and safety policies and initiatives.

As an example of these measures, VINCI Construction Grands Projets has a dedicated audit team within its Quality, Safety, Environment and Information Systems Department (DQSE-I). Its management committee sets an audit schedule each year, based on operational priorities and risks. Each project is audited by VINCI Construction Grands Projets' head office every two years, to ensure that its management system fully complies with safety requirements. These requirements reflect, in particular, applicable standards (ISO 9001, ISO 14001, ISO 45001, etc.), guidelines applied by VINCI, VINCI Construction and VINCI Construction Grands Projets' head office, as well as a project's specific contractual requirements (safety plan, process map, requirements of partners and other interested parties, laws and regulations, local standards, etc.). ISO 9001, which is a core standard for audits, covers all aspects relating to the management, selection, monitoring and assessment of subcontractors. Audits always apply to an entire site and all site personnel, including subcontractors and other staff. Upon completion of an audit, observations are shared with the heads of the relevant project and the audit report is sent to management at every level, including the general management of VINCI Construction Grands Projets. Once the audit report is received, the entity suggests actions to remedy any issues. Project managers and the audit team share responsibility for monitoring the action plan: in general, the project's QSE manager informs the auditor when a measure is implemented and provides evidence of its achievement. Periodic progress reports on achievements and trends are also made. In 2020, in spite of the Covid-19 crisis, 16 audits were performed, including internal audits at headquarters, amounting to 38 audit days.

Audit procedures relating to health and safety at Group entities may also involve obtaining certifications, creating a need for external audits. Accordingly, VINCI Autoroutes has begun the ISO 45001 certification process for occupational health and safety. Cofiroute obtained certification in April 2019, and ASF and Escota expect to meet requirements for certification in the first half of 2021. For these certifications, some 20 audits (internal audits, practice audits and certification surveillance audits) were conducted in 2020, using a shared internal

checklist designed to ensure ISO standards are met. These audits, whether they are conducted by internal or external auditors, serve to assess the quality and maturity level of a range of health and safety management issues and identify strengths, improvement areas and any non-conformities. In the wake of the audits, operational reviews are performed in regions and a management review is conducted centrally. At this time, any corrective action is decided upon and any new objectives are set. Audits typically cover the following areas: company policy; management engagement at all levels; employee participation; training and awareness initiatives; preparation and organisation of work; management of materials, equipment and products; risk prevention for external companies; regulatory compliance and the management of accidental events.

Health or safety certifications at VINCI in 2020

- VINCI Construction: 51% of revenue certified ISO 45001, 48% of revenue certified OHSAS 18001 and 13% of revenue certified MASE-UIC
- VINCI Energies: 36% of revenue certified ISO 45001, 23% of revenue certified OHSAS 18001, ILO, LSC, VCA or SCC and 7% of revenue certified MASE-UIC
- Eurovia: 46% of revenue from the works activity certified OHSAS 18001
- VINCI Autoroutes: Cofiroute obtained ISO 45001 in April 2019, and ASF and Escota began the process with the aim of obtaining certification in 2021
- VINCI Concessions: 30% of entities certified their occupational health and safety management system to OHSAS 18001, ISO 45001 or guidelines specific to their business (LISEA and MESEA)

Auditing and assessment are performed for every business line and division. Similarly, at their own level, projects, sites under operation and worksites implement risk management systems and, therefore, tools to monitor the management of health and safety risks. These systems draw on the results of the risk analysis performed for every Group site and updated on a regular basis.

Health and safety audit procedures in VINCI business lines

- Health and safety policy, procedure, internal audit schedules and dedicated department for every VINCI business line
- Health and safety audits conducted on worksites and sites under operation by health and safety officers at different levels of the organisation (more than 2,500 employees in health and safety roles) and by teams from Group departments
- Expanded cross-auditing practices among companies
- Continuous certification process under way in the Group (ISO 45001, MASE, etc.)
- Close involvement of company managers in audit outcomes and improvement actions taken
- Inclusion of all site personnel (VINCI employees, temporary workers, subcontractors, etc.) in safety audits on worksites and sites under operation

4.3.3 Tailored actions to mitigate risks or prevent serious impacts

For each site or worksite at which VINCI companies inspect the performance of work, a common set of rules applies to all, with no distinction made between employees, temporary workers or subcontractor staff. Where applicable, Group entities help the subcontractors and temporary employment agencies they work with to improve their performance. This assistance is mainly provided at the site under operation or at the worksite.

a. Actions developed and implemented at Group level

• Group-level health and safety policy and guidelines applicable to all

The Group's health and safety policy, which is covered in its Code of Ethics and Conduct and in VINCI's Manifesto, was reinforced by the signature of a joint declaration by the Chairman and CEO of VINCI and the Secretary of the European Works Council. The statement sets a standard for the Group by identifying essential and fundamental occupational health and safety initiatives. It is available in 21 languages and published on VINCI's website (www.vinci.com/vinci.nsf/en/item/essential-and-fundamental-actions-concerning-occupational-health-and-safety.htm). The declaration is the product of steady, constructive social dialogue and part of a continuous effort to engage all employees in promoting a safety culture at VINCI. By communicating broadly on the subject, VINCI has shown that occupational health and safety has reached a high level of visibility and commitment among its top management. Furthermore, the short-term variable remuneration of VINCI's Chairman and CEO is linked to environmental, social and governance (ESG) criteria, including occupational health and safety indicators.

The joint statement reiterates the main thrusts of VINCI's health and safety policy, describes the initiatives and measures to be implemented at all the Group's sites and provides for the monitoring of results.

01

Risk analysis

02

Protective equipment

03

Operating procedures
and processes and work
organisation

04

Safety awareness and
training

At the operational level, each site must conduct a risk analysis at the earliest possible stage ahead of any work situation and, based on the findings of the risk analysis, incorporate preventive measures into operating procedures and processes. Each entity must supply suitable personal protective equipment for each work situation and ensure that each worker fully understands the risks associated with their activity and the measures to take to manage them. Work must also be organised at the site in such a way as to safeguard employees' health and safety.

Employee representatives are expected to be involved in the implementation of initiatives, notably in the prevention of workplace accidents and occupational hazards, and must be empowered to take initiatives. Occupational health and safety awareness and training programmes are essential to ensuring that all workers understand the risks. Employees must receive training during their work hours and, more specifically, be given clear instructions and explanations relating to their job or assignment. They must be familiar with operating procedures and safety regulations and comply with them. Materials and tools must be used as intended, and personal protection equipment must be worn correctly.

1,598

meetings of health, safety and
working conditions committees
across the Group in 2020
(vs 1,542 in 2019)

These rules apply to everyone at VINCI, in all activities, in all companies and in all countries where the Group operates. Each business unit adapts and implements the health and safety policy to closely address its local challenges, in compliance with the global framework.

b. Specific guidelines and initiatives for the Group's business lines to closely address their individual challenges

The Group's business lines and divisions develop guidelines specifically for their activities and disseminate them to all companies in their scope. As a result, each entity applies guidelines from multiple sources – the Group, the business line, the division and the entity itself. These rules strengthen and complement one another, resulting in a tailored response to the situation of each sector, activity or operational context. Together, they shape prevention initiatives, which are integrated into operating procedures, work instructions and the organisation of work, and form the basis for audits conducted on worksites and sites under operation. They are regularly reviewed as part of a continuous improvement effort. All business lines, without exception, apply special scrutiny to major risks. Any incident related to the latter is analysed to discover the underlying or root causes, with the aim to continuously improve the prevention of serious or potentially serious accidents and build a strong safety culture, shared by all.

VINCI Construction is applying its "Building in safety" methodology at all its worksites, everywhere in the world, to spread a shared safety culture. It provides a framework for managing risks at each of a project's key stages. It begins at the design stage, with Safety in Design, a programme to embed safety into work instructions and procedures as early as possible. It continues with pre-task meetings, which bring together methods engineering and works management teams to ensure that the instructions and procedures are operational and take into account the actual risks and safety requirements of the work performance phase. Next, during the work execution phase, the works manager holds a pre-start meeting with their team at the start of every day to ensure that everyone has fully understood the work that has to be done and the safety measures that need to be taken. Whenever a situation is unclear or a change is made that could create a hazard, the "Building in safety" approach also encourages participants to stop and alert their supervisor. Most entities combine the approach with golden rules of safety to be put into practice by all workers to prevent major risks. At Eurovia, health and safety policy is translated into guidelines for each business activity and country. The business line developed an ambitious action plan for 2020-2021 to bolster its management systems, better prevent major risks and update the safety policy. The action plan, which is currently being rolled out, was informed by a survey on health and safety climate perceptions, to which more than 33,000 employees responded in 2019, and by workshops held in 2019 on International Safety Day to share the survey findings and discuss strategies for improvement with all employees. Eurovia's Health and Safety Department is supervising this wide-ranging action plan, which will reinvestigate the major risks specific to the business line's activities and countries of operation as well as the associated prevention measures. Information drawn from the root cause analyses carried out after any accidents and near misses, the safety inspections performed by QSE officers and visits by managers will also contribute to this investigation. Once this step has been completed, countries and business activities will update their guidelines and operating procedures, and report the reasons for each change to the Health and Safety Department. Each country has also developed an action plan to improve the safety of work carried out by subcontractors and other external workers on worksites and sites under operation. In addition, each country has reaffirmed the golden rules for preventing major risks. At each level of hierarchy, from directors to workers, expectations for health and safety are reviewed. This is a prerequisite for a strong safety culture shared by all. Alongside these changes, assistance, information and training are being provided to ensure employees at all levels are aware of, understand and integrate the changes.

Business lines also develop their own action plans or guidelines to address a specific major risk. For example, VINCI Autoroutes observed an average of one maintenance van collision in its motorway network every week. To remedy this situation, it launched an ambitious new action plan in the beginning of 2020, involving the collection of detailed statistics of van collisions, the updating of procedures and equipment, and a system to inform motorway users. A steering committee for the action plan was formed and progress reports are regularly made to the VINCI Autoroutes management committee. Furthermore, as part of its programme to promote responsible driving, the VINCI Autoroutes Foundation rolled out training material and awareness campaigns for the public and professional drivers alike, to remind them of the steps they must take to prevent tragic accidents and protect motorway maintenance personnel. The foundation also ran joint initiatives with external partners that provide driver training or publish training materials for car and truck driving schools, such as École de conduite française and Codes Rousseau.

At VINCI Concessions, the safety policy is championed by a Safety Committee, which meets twice a year and is chaired by the CEO. Each entity is in charge of its own health and safety organisation, in compliance with Group policy, local partner agreements and the laws applicable in its countries of operation. The central Safety Department carries out safety audits as needed and helps new entities joining one of the three business lines (VINCI Airports, VINCI Highways, VINCI Railways) integrate the safety policy by providing targeted training for managers to promote VINCI Concessions' safety culture. VINCI Concessions includes all subcontractors in its health and safety organisation, during both the construction and the operating phases.

• Involvement of employees and employee representative bodies

In their health and safety policies, business units and divisions assert the importance of the participation of employees and employee representatives, as highlighted in the joint declaration of VINCI and its European Works Council. As a result, specific agreements have been negotiated and signed with labour representatives on subjects that improve working conditions, and, by extension, the overall performance of Group companies. This social dialogue on health and safety takes place at every level of VINCI's organisation. In 2020, 33 health, safety and prevention agreements were signed by Group companies (29 in 2019).

Specific training sessions are also held to reinforce the participation of employee representatives and help them carry out their mission with regard to health, safety and working conditions. In 2020, Eurovia took advantage of the opportunity presented by the new organisation of social dialogue in France, where it employs more than 24,000 people, to expand the role and skills of Economic and Social Committee members. Eurovia commissioned the French Professional Agency for Risk Prevention in Building and Civil Engineering (OPPBTP) to develop and deliver a five-day training program to all members of its Economic and Social Committees (and their deputies), co-led by Eurovia's environment prevention quality network. More than 1,100 people have now been trained in occupational risk prevention. The training programme was tailored to perfectly reflect the real-life situations experienced by the Economic and Social Committees of Eurovia and its subsidiaries. For example, additional risks relating to Eurovia's specific business activities were addressed. The session also made use of Préven+, an interactive 3D safety training tool developed in-house by Eurovia.

• Continuous, tailored awareness and training initiatives for all

Each business has its own toolbox of measures and integrates health and safety awareness into its daily routines, such as pre-start and pre-task briefings and 15-minute safety sessions. Initiatives such as these have been rolled out by most of VINCI's businesses and offer daily opportunities to review basic safety rules, explain operating procedures, introduce the work environment and engage employees, temporary workers and subcontractors. These initiatives are coordinated by HSE officers with visible support and commitment from the managers of the worksite or site under operation. Many awareness-raising and training sessions focus on issues specific to each activity, such as working at height, driving vehicles or hand injury risks. Innovation is also central to these training efforts, in order to continuously improve their effectiveness and adapt them to changing activities. For example, VINCI Construction developed Alive on Site, a tool used to film, with employees' consent, work being carried out at height and viewing it later with the team performing the work to identify risky behaviours and best practices in a constructive, supportive atmosphere. This interactive session lasts one half-day or full day and is facilitated by a safety instructor, most often from outside the worksite, to encourage open sharing and discussion. The goal is for the team to exchange viewpoints so that together and individually they become more acutely aware of the risks. Since 2020, VINCI Construction periodically holds discussion sessions with staff to report on accidents and major events and share the corrective measures, to prevent similar situations from reoccurring. Whether conducted remotely as webinars or face-to-face as a worksite team meeting, these discussions help raise workers' awareness of the risks inherent to their work, while fostering their sense of belonging to the company.

38%

of training hours in 2020
devoted to health and safety

In addition to on-site training for employees, a large majority of the Group's businesses have developed training programmes for managers and executives to strengthen their safety culture. At VINCI Construction, the "Managing Safety" programme launched in May 2017 has reached, as of the end of 2020, more than 4,500 managers in the target group of 6,000 managers worldwide. It promotes five essential actions, the first of which is to assess the safety culture of managers prior to their annual performance review. The programme addresses the organisational and human factors in accident prevention. Its aim is to help company managers develop a just culture and improve prevention through a better understanding of root causes. Managers conduct worksite visits on a regular basis in all Group entities. Health and safety are an agenda item of every management committee meeting.

At Group level, the resource centre run by France's Institute for an Industrial Safety Culture (ICSI) is being added to the VINCI Up! e-learning platform, which makes specialised training modules available to employees at all times. In all, employees have access to more than 490 training resources in health and safety, which accounts for 12% of the full catalogue. The business lines' training centres deliver business-oriented technical and practical training. Group companies work with professional associations and with secondary and higher education schools and training centres, in particular with the aim to incorporate safety issues into occupational training.

• Organisation of international health and safety events

Organising dedicated health and safety events is an important driver for developing everyone's skills, making the engagement of managers visible and known to all and promoting a strong safety culture throughout the organisation, among all employees, partners and stakeholders. VINCI companies continue to involve more and more temporary staff and subcontractors, as well as customers, in safety training and awareness.

For this reason, international events are regularly organised by the various business lines and divisions. One such event is International Safety Week, celebrated annually by VINCI Construction and its 70,000 employees, in every company and worksite around the world, since 2014. Each year, the event spotlights a key theme, which is reinforced by strong messages from management. All employees and workers are required to take part. Partners, temporary workers, subcontractors and customers are also included and participate in these events. A variety of events and campaigns, such as conferences, workshops, training sessions and simulation exercises, run throughout the week. In 2019, International Safety Week's theme was "Just say stop!", which is also the fifth step of the "Building in safety" methodology disseminated by VINCI Construction: the worker's right and duty to put a stop to a situation they think is dangerous. In 2020, the overarching theme was "Major risk identification and sharing", expressed with the motto "I see major risks and share them; together, we save lives."

In November 2020, VINCI Concessions also held an International Safety Week for its three business lines (VINCI Airports, VINCI Highways and VINCI Railways), under the banner of "Safe together". All 90 operating entities in 21 countries, including head offices, held events to raise health and safety awareness, with the common thread being the analysis of potentially serious accidents. More than 30,000 employees and partners attended to discuss health and safety. The event saw the launch of Dokit, a new tool to share best practices and safety flashes in real time. Many VINCI subsidiaries also organise in-house competitions to reward health and safety initiatives.

• Risk prevention for subcontractors and temporary employment agencies

Across the Group, VINCI's Subcontractor Relations Guidelines (www.vinci.com/vinci.nsf/en/item/subcontractor-relations-guidelines.htm) underscore the Group's commitment to ensuring the same level of security for its own employees and those of its subcontractors. Many VINCI companies have signed framework contracts with their subcontractors addressing this issue. The zero accident objective is the common denominator in these contracts, which include special clauses covering essential measures such as wearing personal protective equipment, reporting workplace accidents and providing ongoing information on any changes in worksite hazards.

Although temporary workers and subcontractors are included in the safety management system for worksites and sites under operation, specific initiatives have nevertheless been developed for their benefit, some in partnership with professional associations. In France, for example, temporary workers are offered a two-day safety training session and assessment to enable them to obtain a safety passport called Pasi. The passport demonstrates acquisition of the safety fundamentals that temporary workers must understand before they start working at a worksite. VINCI Construction France initially created the Pasi after observing a higher frequency of accidents among temporary than permanent staff, and now the Pasi is used throughout the industry. With this more widespread use, new centres in addition to VINCI Construction France's Cesame centres have become equipped to dispense the Pasi training and assessment, significantly increasing the number and geographic coverage of available training sessions.

VINCI has drawn up a framework agreement for temporary employment agencies (TEAs), which is used in the approval process and is based in particular on occupational health and safety criteria. TEAs must share their health and safety performance data and demonstrate that they promote a safety culture, such as through staff training. It is compulsory for Group entities to use approved agencies to recruit their temporary workers. Agency-specific action plans have been developed on a case-by-case basis to improve quality of service and safety. These plans also contain additional measures to enhance the safety of temporary staff, ranging from surveys of temporary staff and feedback reports on prevention, awareness and training actions led by the company to improvements in record keeping for staff and safety documents (Carte BTP – a professional identification card for construction site workers, Pasi – a safety passport for temporary workers, etc.).

23%

of temporary employment agencies did not meet the Group's ESG criteria during the latest approval process

• Health and safety measures taken to manage the health crisis

Since the start of the health crisis and all throughout the year, managers and their team members in health and safety roles have been extensively mobilised in the planning and implementation of preventive measures to ensure the continuity of operations and a safe environment for employees and other stakeholders (users, customers, external staff, etc.). One feature of VINCI's businesses is that many jobs cannot be carried out by working from home. Another is that even during a lockdown, Group subsidiaries must sometimes continue to provide certain essential services (operating motorways and airports, performing energy maintenance, keeping up essential worksites, and so forth.).

VINCI's health and safety staff worked to:

- analyse work environments, job descriptions and the individual situations of workers with higher risks of exposure;
- adapt work instructions to incorporate new operating procedures, reflecting the situation and the organisation of work in agencies and at worksites and sites under operation;
- reorganise work environments and provide suitable personal and collective protective equipment;
- train and raise awareness of employees: staff informed employees of the protective measures to prevent virus transmission and the new rules to integrate and apply, while also communicating abundantly on conventional risks, to avoid a situation where coronavirus prevention causes people to neglect other important safety measures;
- set up psychological support services and train managers in psychosocial risk prevention;
- expand the number of "Covid officers" to assist managers, employees and outside partners in setting up protective measures at worksites and sites under operation and report information from the field and any required adaptations;
- set up governance structures to monitor the situation day to day and coordinate initiatives.

Group companies involved employees and employee representatives in implementing these measures and worked jointly with industry and professional associations to comply with recommendations and requirements issued by the various authorities of the countries where VINCI does business. A more detailed description complete with examples of the measures taken is provided in paragraph 1.2, "Health, safety and security of employees, temporary staff and subcontractors", pages 190 to 193).

4.3.4 Alert mechanisms and processing of reports

The joint declaration signed in 2017 by VINCI's Chairman and CEO Xavier Huillard, and the European Works Council emphasises that any situation observed by employees that represents an imminent threat to health and safety must be immediately reported to the employer or relevant superior and that no employee can be reprimanded for making such a report. Likewise, depending on the operational context, employees can avail themselves of procedures such as exercising the right to refuse work, if they believe the situation presents a serious and imminent danger to their life or health. Managers are therefore strongly encouraged to raise alerts and report hazards. Business lines and divisions continue to develop and disseminate new digital applications to ease the reporting of hazardous situations and near misses and facilitate the processing and sharing of this information.

An application called "Move Safe" was launched in May 2019 for all VINCI Autoroutes entities. It enables any employee to electronically report any information about a dangerous situation or near miss. Employees make more than 3,000 reports each year and thereby contribute all together to raising safety levels in the company. The application was recently updated to enable employees to also report incidents relating to the environment, quality and diversity. In addition, local risk prevention groups are set up every quarter in regional divisions. Their members are employees from all business activities, and as such can discuss occupational health and safety issues with full knowledge of the local context.

At VINCI Energies, the Safety Up application, which is available in 10 languages and has been downloaded by more than 16,000 employees, can be used to report hazardous situations as well as share best practices and news flashes. The application was designed as an awareness-raising tool and is co-managed centrally and by companies, with the close involvement of managers, to encourage local communication and use within companies. In 2020, new features were added to the application, including 15-minute safety sessions. It is the most frequently downloaded application for use "in the field" at VINCI Energies. A webinar to present the new features was held in November 2020.

Also in 2020, Watch, an application by VINCI Construction which makes it easy for any employee to report a hazardous situation or a best practice observed at a worksite using their smartphone, was interfaced with BeSafe, the QHSE solution used globally by VINCI Construction to consolidate reported data. BeSafe is a shared incident management and reporting solution that helps ensure the traceability, reliability and facilitated sharing of information. It has been designed to make life easier for users and encourage the implementation of appropriate measures to reduce the company's major risks. The most frequently occurring situations are analysed to identify corrective actions to be taken. Likewise, for all potentially serious incidents, the underlying causes are systematically investigated. The solution enables all levels of the organisation to view results in real time, for effective global coordination.

4.3.5 Monitoring of measures implemented and assessment of their effectiveness

• Health and safety monitoring indicators

Relevant indicators measuring the outcomes of initiatives are presented to the management committees of business lines and divisions, providing the opportunity to discuss how to improve them and to reaffirm the management's commitment. At VINCI Autoroutes, the management committee examines key indicators every two weeks. Furthermore, management reviews are held annually as part of the ISO 45001 certification process, to analyse results obtained and set new goals for the future. At VINCI Concessions, the Safety Department monitors safety statistics continuously, using a centralised reporting tool that includes safety data from all entities and their subcontractors, whether or not the entities are part of their financial consolidation scope. Monthly dashboards are produced for each business activity and any changes are analysed. At VINCI Construction, the network of safety officers from across the business line meets quarterly, along with the management of each division. At Group level, in addition to presentations to VINCI's Executive Management, presentations are made to the Board of Directors' Strategy and CSR Committee, Remuneration Committee and Appointments and Corporate Governance Committee, in order to evaluate managers' performance, and to the Board of Directors itself.

The close monitoring carried out by the Group and its business lines and divisions may trigger the commissioning of a third-party audit, especially in the event of the decline of a key performance indicator. Safety data on temporary staff and subcontractors is increasingly included in health and safety performance monitoring indicators. The gap between the workplace accident frequency rates of VINCI employees and temporary staff reflects differences in the jobs performed, in safety awareness, and in technical know-how and experience. Reports on workplace accidents involving temporary staff enable VINCI companies to take concrete steps to prevent them from recurring.

Main monitoring indicators

- Lost-time workplace accident frequency rate, worldwide:
 - VINCI employees (%): 5.32 in 2020 (5.9 in 2019 and 7.08 in 2015)
 - Temporary staff: 14.09 in 2020 (16.24 in 2019 and 12.71 in 2015)
- Workplace accident severity rate (VINCI employees) (%): 0.43 in 2020 (0.38 in 2019 and 0.51 in 2015)
- Percentage of Group companies with no lost-time workplace accidents: 75% in 2020 (72% in 2019 and 71% in 2015)

Definitions

- Lost-time workplace accident frequency rate = (number of lost-time workplace accidents x 1,000,000)/number of hours worked
- Workplace accident severity rate = (number of days lost due to workplace accidents x 1,000)/number of hours worked

(*) These indicators were verified with a reasonable level of assurance by an independent third party.

• Specific monitoring for potentially serious incidents and alert procedure for fatal accidents

VINCI's business activities expose employees and other workers at its worksites and sites under operation to risks with potentially serious consequences. Every accident is immediately notified to VINCI's Executive Management and thoroughly and methodically investigated. An in-depth analysis is carried out with all parties involved and a full report is made to VINCI's Chairman and CEO, to the relevant members of the Executive Committee and to the Group Human Resources Director. The report includes a detailed description of the circumstances of the accident, an explanation and analysis of the causes and a presentation of the corrective actions that have been taken. The goal of the report is to ensure that all necessary steps have been taken and shared throughout the Group to improve prevention measures in place and prevent another accident from occurring in similar circumstances. The Bureau members of the European Works Council are also informed and involved. They receive quarterly updates on accidents, regardless of the country where they occurred. This procedure applies systematically, whether the victim is a Group employee, a temporary worker, an employee of a subcontractor, joint contractor or leasing company, or a third party.

Business lines and divisions also take special steps to reinforce accident prevention by monitoring potentially serious incidents. Incidents found to meet this description are consolidated, compared and analysed to identify their underlying risks, root causes and trends. By identifying a combination of circumstances that potentially lead to a serious accident, the analysis enables VINCI to implement curative and, more importantly, preventive measures. Once the root cause analysis of a serious accident has been carried out, a full report is made to management committees.

4.4 Duty of vigilance with regard to human rights

VINCI has made public commitments to protect and promote the rights of people and local communities that may be impacted by its projects and activities. The Group continuously develops and strengthens its procedures to assess and prevent human rights risks, while also assisting its entities to engage on the issue and find operational solutions. This is because it understands that issues affect people's lives at the local level and considers that solutions must therefore be developed on the ground, close to its operations. Fully aware of the complexity of the challenge, VINCI has also adopted a continuous improvement approach with its stakeholders and peers.

4.4.1 Mapping of the Group's major risks

• Identification of VINCI's salient issues

At the end of 2015, VINCI formed a Human Rights Steering Committee to step up its work in this area and identify the Group's salient issues. Meetings were organised with many employees in France and abroad to build awareness of human rights issues and compare viewpoints. At the same time, opportunities were provided for representatives of civil society or other companies outside of VINCI to share their experience. The steering committee also took into account various specialised studies (such as those of the Danish Institute for Human Rights) and guidelines or previous work produced by the Group or its entities (the handbook on fundamental social rights, standards for living conditions, etc.).

Main international standards and conventions underlying VINCI's approach

- Universal Declaration of Human Rights (UDHR)
- International Covenant on Civil and Political Rights (ICCPR)
- International Covenant on Economic, Social and Cultural Rights (ICESCR)
- Eight fundamental conventions of the International Labour Organisation (ILO)
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- United Nations' Guiding Principles on Business and Human Rights (UNGPs)

Furthermore, the analysis of risks and issues also took into account the results of the human rights impact assessment in Qatar, commissioned by VINCI and carried out in 2015 by an independent third party, Business for Social Responsibility (BSR). The methodology used for the assessment was to first identify, in the rights enshrined in the International Bill of Human Rights, the ILO's fundamental conventions and the United Nations' Guiding Principles on Business and Human Rights, the issues that were salient to the Group's activities. Based on this first selection, sectoral research was analysed and interviews were held with key VINCI stakeholders, such as the Building and Wood Workers' International (BWI), the ILO, the International Organisation for Migration (IOM), the French National Consultative Commission on Human Rights (CNCDH), the Danish Institute for Human Rights, and NGOs having worked on human rights issues in that region (Amnesty International, Human Rights Watch, Engineers Against Poverty, Business & Human Rights Resource Centre, etc.).

All or some of the members of the steering committee met monthly, sometimes in the presence of third parties who shared their expertise and/or past experience in a given area. In the summer of 2016, the steering committee validated the Group's key issues and corresponding guidelines, which translate into rules applying to all VINCI entities.

• VINCI's salient human rights issues

The critical analysis of all of these sources led to the identification of five salient issues, broken down into 17 specific themes. They describe areas where VINCI's activities can have a significant impact on human rights, which include those of employees, subcontractors, temporary staff, local residents and local communities. These five issues cover the entire project life cycle, from the response to the call for tenders to the preparation of sites and construction, until the commissioning and operational phases. This work was published in VINCI's Guide on Human Rights, which is available to all on the VINCI website (www.vinci.com/vinci.nsf/en/item/guide-on-Human-rights.htm). Since their publication, the relevance of the salient issues it identifies has been confirmed by various Group entities and validated by feedback from operational teams in different countries. During their most recent discussions of the content of the duty of vigilance plan, the members of the European Works Council had no suggested amendments to these salient issues. The five salient issues and 17 themes are presented in the table below.

Salient issues	Description	Themes
1. Labour migration and recruitment practices	In the course of their activities, VINCI companies may recruit migrant workers, whether directly or through temporary employment agencies. The situation of these migrant workers can reflect a range of scenarios, depending on the conditions of their migration (travel conditions, administrative formalities, recruitment, accommodation, etc.). Due to varying recruitment practices and national legislation on migration, risks of serious breaches of the rights of migrant workers, such as the risk of forced labour, might arise.	1. Recruitment fees and debts 2. Contract substitution 3. Work permit, ID, visa, passport and exit permit
2. Working conditions	This issue relates to potential breaches of fundamental employment rights that could result from a lack of vigilance concerning working conditions, such as wages and their payment, number of hours worked, paid holidays and employment benefits, and restrictions to freedom of association. Given the nature of the Group's activities, employee health and safety is a separate important issue, which has been specifically addressed by the Group and its various entities for many years now.	4. Wage levels 5. Working hours 6. Paid holidays and other benefits 7. Workers representation 8. Hiring underage workers 9. Discrimination 10. Health and safety 11. Worksite security
3. Living conditions	Group companies may supply accommodation to workers, due to the size, location or mobile nature of certain projects or worksites. In these cases, employers must ensure that the living conditions provided to workers guarantee their physical security and safety and satisfy their fundamental needs.	12. Labour community standards on accommodation: health, safety and security 13. Freedom of movement, consultation, and grievance mechanism
4. Human rights practices in the value chain	This issue concerns the monitoring of subcontractors and the living and working conditions of their employees or temporary staff on sites. VINCI considers that its challenges and those faced by its subcontractors are identical. It pays special attention to health and safety issues.	14. Recruitment practices, working and living conditions of subcontractor employees and temporary staff, and management of labour-related risks in the supply chain.
5. Local communities	Construction and infrastructure operation projects can impact local communities and nearby residents. Customers, concession holders and construction companies all share responsibilities, varying from one project to another, and must work in close collaboration to identify, avoid or mitigate each project's potentially negative impact on local communities (for example, negative impacts on the environment and on the daily lives and livelihoods of nearby residents).	15. Socio-environmental issues 16. Land-related issues 17. Community dialogue, engagement, and remediation mechanisms

• Country-specific analysis and prioritisation of issues

Although the Group has identified the salient issues for all of its activities and defined a common baseline of minimum requirements for each theme, it also considers that it is essential to assess the relevance of these issues in a given context and prioritise them accordingly. For this reason, VINCI develops human rights risk maps identifying priorities for a given country, to help local entities better manage their environment and deliver the right response to local issues. All 17 themes identified by the Group are analysed for the country, using the information in reports from public administrations, international organisations, non-governmental organisations (NGOs), academics, trade unions, the media, and so on. This provides a more granular picture of the risks inherent to each country in VINCI's sector of activity as analysed and reported by a set of relevant third parties. The country analysis includes information on the legal and institutional framework and reiterates the Group's guidelines. It is a key tool used to assess each subsidiary's situation and set priorities. It is also an essential resource for raising the awareness of Group employees and teams in relation to risks requiring increased vigilance in a given country, including those faced when entering into contractual relationships or partnerships.

These country analyses are being produced gradually. Target countries are chosen based on eight recognised international indicators established by international organisations, NGOs or trade union organisations^(*) and on internal indicators measuring the local presence of VINCI companies in terms of workforce and revenue. Priority is given to countries where the Group's presence is strong and human rights are deemed to be at risk. The ranking is reviewed each year, to take into account project-based activities of VINCI companies, which can increase or decrease their geographical presence or their level of activity, and external indicators. If needed, other country analyses may be developed to better identify potential issues and risks when preparing a response to a call for tenders. At this stage, the risk maps may not cover any employees, since they are being drawn up before the new business activity is launched. They are subsequently fine-tuned based on new research, feedback from operational teams and reported alerts. The Group will continue to expand and update these assessments in 2021. Three new risk maps are currently in progress.

(*) World Bank, *Worldwide Governance Indicators – Rule of Law*; Transparency International – *Corruption Perceptions Index*; United Nations Development Programme (UNDP) – *Human Development Index*; World Economic Forum – *Global Gender Gap Report*; US Department of State – *Trafficking in Persons Report*; Ratification of International Labour Organisation (ILO) – *Eight fundamental conventions*; Freedom House – *Freedom in the World report*; International Trade Union Confederation (ITUC) – *Global Rights Index*.

Country-specific analysis of human rights risks

- 20 country-specific human rights risk maps, developed with the support of an external provider, available in 2020
- 16 human rights country fact sheets produced by the CSR Department, which also helps in preparing responses to calls for tenders
- Specific risk analysis covers 27% of the Group's international workforce (excluding France)^(*) and 88% of the workforce in countries identified by the Group as high-priority^(*) with respect to these human rights risk assessments.

^(*) The 2020 action plan is based on data at 31 December 2019.

4.4.2 Measures to assess the situation of subsidiaries, subcontractors and suppliers

• Assessing the situation of subsidiaries

The Group has developed a performance assessment tool based on its five salient issues and 17 themes, along with the corresponding guidelines. All documents produced are therefore based on the same elements: the country's risk map and the assessment tool. For each of the 17 themes, the tool presents a series of precise questions – for a total of 200 – to determine whether the management systems in place conform to the Group's guidelines and whether they adequately manage and prevent the risks specifically identified in that country's risk map. This in-depth assessment provides a clear picture of the performance of an entity or a project. Based on its results, the entity or project builds an action plan and reports on it to its division's Human Resources Department, which in turn informs the Group through its steering committee representative. As necessary, the CSR Department will specifically monitor major risks. Where applicable, the tool is also used to varying degrees to analyse major projects, whether during the tender process or once the project is under way.

VINCI took the opportunity to update the tool in 2020. Meetings were held with the different internal evaluators to collect their feedback and update some content. Several international business and human rights specialists were commissioned to provide their critical, outside perspective, and changes are currently being made based on their recommendations. In light of the travel restrictions imposed this year due to the health crisis, plans to move to a digital format are being made. Training for evaluators continued throughout the year, to improve their knowledge of the tool and the main issues. These assessments are a mainstay of VINCI's human rights policy.

With regard to internal control, the Group may initiate unannounced verifications of compliance with the rules set out in its reference documents, as a complement to the controls put in place by business lines and divisions. VINCI's annual internal control survey was revised to reinforce the portion devoted to the prevention of human rights risks. This survey aligns with the requirements of the reference framework published by the Autorité des Marchés Financiers (AMF, the French securities regulator), which states that parent companies must ensure that subsidiaries have risk management and internal control systems. In 2020, the survey again included questions about the dissemination of the Group's framework publications and resources and contained additional items on the systems used to monitor overtime and on the risk prevention measures taken when working with subcontractors or temporary employment agencies. Survey findings are presented to the heads of internal control, the members of the Human Rights Steering Committee and the members of the Group's Board of Directors.

• Audits of subsidiaries by third parties

In some cases, audits or other external controls have been set up by the Group and/or its subsidiaries.

This is the case in Qatar, where a framework agreement was signed by VINCI, its subsidiary Qatari Diar VINCI Construction (QDVC), and Building and Wood Workers' International (BWI). It provides for an extensive monitoring, control and audit system under the aegis of a reference group composed of representatives of the three parties. The agreement covers human rights in the workplace, accommodation, and issues relating to the fair recruitment and the labour rights of workers. It applies to all workers employed by QDVC in Qatar, including subcontractors and temporary workers. An audit was conducted in January 2019, during which representatives of the three signatories were present, including BWI's auditors and VINCI's trade union representatives. It covered every point in the agreement, and the auditors also had the opportunity to observe the election of Workers' Welfare Committee members at the end of a two-year term. A joint audit report was published (<https://bit.ly/39Nbkt7>). QDVC continues to apply the terms of the framework agreement in its day-to-day business.

With regard to its airport activities in Cambodia, in 2018, VINCI commissioned an audit of psychosocial risks from an independent body, along with new audits of three main temporary employment agency partners. These measures were taken following mediation by the French National Contact Point (NCP) regarding the implementation of the OECD Guidelines for Multinational Enterprises. The NCP found that the Group respected the OECD Guidelines in a complex national context and had taken appropriate due diligence measures for its Cambodian subsidiary. In 2019, the application of the NCP's recommendations, finalised in December 2018, as well as those from the independent psychosocial risks audit, were specifically monitored by Cambodia Airports, VINCI Airports and VINCI. The implemented measures included increasing the workforce, reinforcing medical follow-up for selected categories of staff and replacing equipment to facilitate certain tasks and reduce the associated physical strain. In December 2019, a progress report was made to the NCP on the implementation of its recommendations. In 2020, which saw the health crisis and a decline of close to 97% in air traffic compared to 2019, the management of Cambodia Airports met regularly with trade union leaders to keep them informed of the company's situation and the decisions adopted to ensure its survival. Special measures were taken to ensure the health and safety of all employees and to maintain their employment and remuneration, especially for the categories of workers receiving the lowest pay, which is at least equivalent to 174% of the country's minimum wage. However, due to the economic situation and the weak prospects for the recovery of activity, the company was obliged to launch a restructuring plan at the end of the year. It will affect, in particular, Siem Reap Airport, which was by far the hardest hit and has seen a 99% fall in traffic since April, with one or two flights maintained per week. As a result, only 14% of the staff are at work.

• Assessing the situation of subcontractors and suppliers

In VINCI's businesses, whether Contracting or Concessions, the major challenges are at the operational level. Accordingly, when it comes to vigilance with regard to human rights risks in the value chain, subcontractors and temporary employment agency workers on sites are a priority.

The Group has provided all entities with a due diligence methodology in five steps: mapping of human rights risks for subcontractors, use of specific criteria during selection procedures, inclusion of specific clauses in contracts, control of these contractual requirements, and the implementation of monitoring procedures. Other verifications and audits are carried out on a case-by-case basis. In Qatar, VINCI's subsidiary QDVC set up a robust assessment and monitoring process for subcontractors many years ago, which includes audits of documentation as well as interviews with workers. Over the 2019-2020 period, QDVC conducted 33 audits focusing on human rights and working conditions and 84 audits looking at the living conditions provided by subcontractors and labour suppliers. QDVC continued to improve its due diligence system in 2020. For the early prevention of any risks to workers' rights related to subcontracting, it has introduced an auditing process during the pre-qualification phase. These audits add to the application of assessment criteria during the selection phase and audits during contract execution. In 2019-2020, QDVC performed 45 pre-qualification audits investigating the working conditions of migrant workers.

To further these efforts, the Group is rolling out new pilot projects in business lines, focusing on the analysis and prevention of social risks in subcontracting. One aim is to assess the social risk management practices already in place and identify improvement areas. Another is to build social risk maps for each category of subcontracting, so that vigilance can be reinforced for those with a higher exposure to risks. Parallel to these far-ranging efforts, on-site audits are conducted by an independent third party (see "Preventing social risks in subcontracting in France", pages 258 to 259).

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audits of the working and living conditions for QDVC's subcontractors in 2019-2020, covering 89% of subcontractor employees on site

In respect of temporary employment agencies, the Group's Purchasing Coordination unit has set up a framework agreement to select approved agencies. The non-financial criteria used to assess them relate to occupational health and safety, training, diversity, the prevention of illegal and undeclared work, and the existence of a whistleblowing system for employees. In France, it is compulsory for Group entities to use approved agencies to recruit their temporary workers. Agency-specific improvement plans have been developed on a case-by-case basis (see also paragraph 4.3, "Duty of vigilance with regard to health and safety"). During the latest agency selection process, 23% of those assessed were excluded based on ESG criteria. Group companies continue to monitor the performance of approved agencies to prevent risks of violating workers' rights. For example, controls are carried out on payroll systems, to ensure that all hours worked are paid, and on the full reporting and payment of social contributions to accredited organisations, to ensure that workers access the social benefits they are entitled to. These items are verified during subsidiary performance assessments.

For purchasing categories that are shared by all business lines, that significantly impact revenue, or that involve significant non-financial risks, specific CSR assessments of suppliers are conducted with the Group's Purchasing Coordination unit. The purchasing category is analysed in depth and the associated social and environmental risks are mapped. Invitations to tender and specifications integrate social and environmental criteria. Depending on the purchasing category, these criteria may include the environmental impact of the suppliers' products and services, the conditions in which they are produced (including health and safety aspects), the suppliers' societal commitments, and so on. Based on how they perform against the criteria, some suppliers are discarded, while for others, a CSR improvement plan is proposed, with the aim to promote collective upskilling. In 2020, the CSR Department's work focused mainly on the following purchasing categories: standard temporary employment agencies, temporary employment agencies working in the area of social integration, vehicles, civil engineering contracts, security agencies and fuel. For each category, it reviewed risks and updated questionnaires. This methodology and the produced guidelines will continue to be applied and disseminated throughout the Group. An introduction to responsible purchasing e-learning module was also designed and launched in 2020. A more advanced module for the Group purchasing teams is currently being developed.

4.4.3 Tailored actions to mitigate risks or prevent serious impacts

a. Actions implemented at Group level

VINCI issues guidelines to provide a shared framework for all of its business lines and employees.

• Guidelines addressing the salient issues and applicable across the Group

At the core of its approach is a framework document developed by VINCI and applied across the Group: VINCI's Guide on Human Rights, which was validated by the Group's Executive Committee in April 2017. It contains guidelines for entities to follow when setting up human rights risk prevention practices and measures. It was designed to be adapted to the on-the-ground reality of each sector and activity. The guide is distributed with an annexe describing the main issues in detail, explaining the challenges involved and offering concrete recommendations and best practices to better support employees. Prior to publication, in early 2017, the European Works Council was consulted and approved the Group's initiative.

Excerpt from the VINCI's Guide on Human Rights

- In the course of the work conducted to identify the Group's salient issues, it was revealed that labour migration combined with poor recruitment practices and a restrictive legal environment created a risk with regard to which the Group and its entities must be particularly vigilant. One of the key aspects of this issue, and an identified risk factor, is debt bondage. Accordingly, to provide practical assistance to operational teams on how to prevent this risk, the following guidelines were established:
 - no fees are to be charged to candidates at any stage of the selection, recruitment and hiring process;
 - all contracts signed with recruitment agencies must include a 'no fees' policy;
 - recruitment agencies must be transparent to end-user companies with regard to their practices, in particular the use of agents or subagents, and their costs and terms of engagement;
 - the company and its recruitment agencies must ensure that candidates are made aware that no fees should be charged at any stage of the recruitment process;
 - confidential channels for reporting complaints about fees must be made available to migrant workers."
- When assessing the situation of subsidiaries, the Group is especially vigilant about this issue.

The development and circulation of these guidelines also reflect VINCI's efforts to anticipate risk factors as early as possible and provide suitable responses to prevent abuses.

VINCI's Guide on Human Rights was widely distributed among the Group's employees and was presented to the management committees of the Group's business lines and divisions. Continuous efforts are made to build awareness in management committees through similar initiatives. In 2020, despite the inability to hold in-person events or travel internationally, the CSR team attended virtual meetings of management committees, HR boards and regional and thematic Pivot Clubs to maintain and increase awareness among executives and managers. According to the 2020 survey of VINCI's internal control, 93% of entities, all business lines and divisions combined, had communicated about the Guide and its guidelines to their employees at end-September 2020, an increase of 10 points over the previous year. For the remaining entities, a plan of action is under way to do the same. To facilitate the adoption and dissemination of the guidelines, the guide, which primarily addresses VINCI employees, was translated into 22 languages, thereby covering more than 98% of the Group's workforce, based on the official languages of the countries where the Group operates. External stakeholders can also access the guide on VINCI's website.

93%

of entities in VINCI's
internal control survey have
communicated to their
employees on VINCI's Guide on
Human Rights

- **Incorporation of guidelines into internal processes and operating procedures**

Guidelines are gradually incorporated into the internal rules and procedures of business units and divisions. For example, in 2019, VINCI Construction Grands Projets added a human rights alert mechanism to its internal procedures guides for key project processes, such as recruitment. Internal standards for living conditions, which are based on the Group's guidelines but adapted to the division's business activities, were also reviewed and validated, as in other Group divisions. The division significantly reinforced the human rights component of its tendering guide to help teams in charge of responding to calls for tenders to better understand and manage risks early in the process. This work to incorporate guidelines, particularly with regard to tendering, was continued and intensified in 2020.

VINCI's guidelines are also directly incorporated into processes and procedures at the company and project levels. For this reason, VINCI's Guide and its Annexe were designed with practical implementation in mind. Issues such as wage levels, working hours, paid holidays, workers' representation, discrimination, and hiring underage workers are first assessed and managed according to the human resources procedures and rules applied by companies and projects. Rules on site safety, managing the various levels of subcontracting at sites under their control, promoting dialogue and managing negative impacts on local communities are also applied locally. Given this context, audits of human rights risk management in subsidiaries and projects is a key means of providing support. Such audits are opportunities to perform joint assessments, clearly set expectations, take into account the operating environment and identify any areas for improvement. They also help auditors detect locally developed solutions and best practices to be more widely shared. These audits go further than the content of VINCI's Guide, enabling a comprehensive, personalised approach to risks and challenges, as well as an opportunity to incorporate the guidelines more fully (see paragraph 4.2.2, "Measures to assess the situation of subsidiaries, subcontractors and suppliers").

- **Awareness and training initiatives for employees and managers**

The Group considers that in matters of human rights, managers play a decisive role. It places emphasis on awareness and training initiatives designed especially for managers and other employees and that reflect their on-the-ground realities. The objective is to develop a prevention culture in this area, similar to what has been achieved in safety and security, and to provide operational teams with the means of acting as early as possible. The Group considers it essential to train employees in these issues so that they are able to identify problematic risk situations and understand how to prevent them.

In 2019, it launched an e-learning module in French, English and Spanish to raise awareness of human rights risks, which culminated a year of collaborative development. In 2020, the course was translated into Portuguese and Polish. The training is available to all entities and employees through VINCI's e-learning portal. It is directed at managers and people in charge of human resources, administration, finance, and health and safety as a priority. The Human Rights Steering Committee monitors the e-learning module. More than 1,500 employees belonging to the target groups, from more than 50 different countries, had completed all four parts of the training by the end of 2020. In addition, several of the Group's core, emblematic training programmes now include a human rights module. One example is the Team Grands Projets training programme implemented across contracting business lines. Teams Grand Projets addresses site managers, technical directors, works directors, equipment managers and administrative and financial directors. Its objective is to bolster the skills of people in charge of major projects and help them manage increasingly complex environments using a risk-oriented approach.

VINCI also communicates on human rights issues at key Group-wide events. The latest VINCI conference, attended by the Group's 500 top executives, mainly focused on CSR commitments, business ethics, and dialogue with stakeholders. A roundtable on the human rights obligations and duties of businesses included guest participants who contributed their outside perspective and specialist knowledge. In-house speakers also shared their experience with the audience of managers. Video recordings of the conference sessions and roundtables have been made available to all employees on the Group intranet. Top managers communicated more frequently in 2020, putting into practice a pillar of VINCI's management model, which is the manager's duty to set an example. Accordingly, they strove to make their commitment visible to employees and middle managers. VINCI made regular use of its internal communications tools. For example, the Group recently put the spotlight on ethics and human rights in its newsletter for all employees, in the context of International Anti-Corruption Day and International Human Rights Day. In this issue, the Group reaffirmed its commitments and reminded employees of the resources available to them.

• Active participation in collaborative initiatives

The issues facing VINCI and its entities are often complex and involve multiple players throughout the value chain. Although VINCI continually enhances its risk prevention and management systems, it does not always have the influence necessary to pursue every possible action, due to its position in the value chain and the cyclical nature of its activities. For this reason, as a complement to its in-house efforts, VINCI has joined a number of external networks and initiatives in order to work in collaboration with other stakeholders on tools, methodologies and initiatives to promote the respect of human rights and, in particular, to help develop ethical labour sourcing in certain parts of the world.

Main collaborative initiatives in which VINCI participates

- **Building Responsibly**, of which VINCI is a founding member. Building Responsibly brings together engineering and construction firms in order to develop common approaches and standards, share best practices, tools and experiences, and engage stakeholders and all actors in the value chain to find concrete and collective solutions to the challenges faced by the sector. In 2020, the coalition welcomed new members and reorganised its governance. VINCI was elected as a member of its steering committee. During the year, Building Responsibly's main focuses were the management of risks associated with the pandemic and the publication of case studies illustrating how members implement the coalition's principles. The coalition's members also developed practical tools such as a pre-qualification questionnaire to assess the human rights performance of worksite personnel. It will continue to encourage more companies in the sector to join the initiative. A meeting with stakeholders is scheduled for early 2021.
- **Leadership Group for Responsible Recruitment**, which welcomed VINCI to its steering committee in June 2017. This collaborative initiative between leading companies and expert organisations strives to promote responsible recruitment practices and combat forced labour. In 2020, for the first time, it asked its members to report on how they implement the Employer Pays Principle in their operations. An outside third party was commissioned to analyse the data collected.
- **Entreprises pour les droits de l'Homme / Businesses for Human Rights**, of which VINCI is an executive board member. This association of 19 leading French companies is a forum for discussion, initiatives and proposals by these businesses to improve the integration of human rights into business policies and practices. In the past two years and in tandem with organisations such as the Responsible Business Alliance, the Consumer Goods Forum and the ILO, it has encouraged greater efforts by French businesses to combat forced labour. Companies such as VINCI discuss the challenges they encounter and the preventive measures they have taken. Three new companies joined Businesses for Human Rights in 2020.

b. Actions adapted to local contexts

This section presents significant initiatives implemented and monitored by the Group in two countries, France and Qatar, to prevent risks or promote human rights. They illustrate the complementary nature of VINCI's approach, which combines general guidelines, promoted and disseminated by the Group, with solutions tailored to the individual business environment, obtained by adapting the guidelines to local challenges.

• Preventing social risks in subcontracting in France

The issues faced by VINCI are not limited to regions outside of France. Tensions in the building and civil engineering markets, combined with increased competition and labour flows in Europe, have led the Group to strengthen its duty of vigilance with regard to managing social risks and preventing illegal work in its supply chain in France.

To do so, the Group launched pilot projects, first in the Greater Paris area, for the Building and Civil Engineering businesses of VINCI Construction France, and then for the Ouest and Nouvelle-Aquitaine regional divisions to broaden the mix of business activities and regions. These entities implemented a new approach to managing social risks in subcontracting, in three phases:

- diagnosis and mapping of social risks in subcontracting based on purchasing category;
- diagnosis of the effectiveness of existing risk prevention measures;
- development of an action plan incorporating the core measures implemented at VINCI Construction France, such as responsibility assignment matrices, CSR assessments of subcontractors and reinforced vigilance measures for purchasing categories involving the highest levels of risk.

Business lines and managers were involved at all levels, from the head office to worksites (including functional directors, regional directors, business unit heads, works managers, works supervisors, team leaders, etc.), and across the main support functions (such as human resources, legal, purchasing and risk prevention). VINCI Construction France formed a steering committee at its top management level, which is overseen by its General Secretary, its Human Resources Director and its Technical and Operational Resources Director. In all, several hundred participants in the chain of operations contributed their input to the diagnoses to provide the most complete picture, as true as possible to on-the-ground realities.

At the end of 2019, VINCI Construction France expanded its responsible subcontracting initiative to include all its activities and regional divisions. Training was delivered to the heads of legal, human resources, purchasing and QHSE (quality, health and safety, and the environment). They will work with operational managers to develop a responsible subcontracting policy for their own regional division, taking into account the region's socio-economic situation, and build an action plan. These action plans were to be finalised in 2020, but due to delays caused by the health crisis, they are expected to be ready in 2021. The action plans should cover the entire subcontracting process, from the initial decision to subcontract, to selecting the subcontractor, to assessing the subcontractor's performance after completion of the work.

VINCI Construction France launched EasyPics across the country in November 2019, to better organise information on subcontractors and make their selection more reliable. Works managers can use the solution to assess subcontractors working at their worksites against a shared set of criteria that incorporates social risks. It also helps them choose a subcontracting company early in the project based on the assessments of other departments. This data sharing is conducive to a more consistent approach to subcontracting. Warnings can be quickly issued in the event of a risk or non-conformity, and support can be provided to companies in need of it.

In addition to these measures for more effective prevention of social risks, social auditing in subcontracting was launched in 2019. Since social compliance auditing was new to the industry in France, specific tools and assessment criteria for building and civil engineering activities had to be developed before such audits could be conducted by external auditors and monitored by the Group. The audit procedure was therefore adapted to different types of worksite – for example, major projects conducted as joint operations, smaller worksites fully controlled by VINCI, or worksites in the launch or finalisation phase. During these audits, particular attention is given to aspects involving the on-boarding and management of subcontractor employees, such as employment contracts, payment of wages and compliance with obligations in respect of working time and health and safety. Feedback from the audits, which are positively perceived by worksite teams and subcontractors, serves to fine-tune prevention initiatives and, if applicable, update the risk map or assessments of partner companies. Follow-up audits of the same worksites were launched in 2020 to monitor their progress, ensure that action plans are being carried out and continue to provide support to operational teams, who are demonstrating more and more knowledge of these issues. This series of audits will be completed in early 2021.

At the end of 2020, a working group was set up to develop a training module for a team of internal auditors so they can provide continuous support to worksites as part of their social risk prevention initiatives.

In 2020, VINCI Immobilier joined these efforts to prevent social risks in subcontracting in France. The three-phase methodology was adapted to its status as a project owner. The results of the preparatory work and the associated action plan were presented to the management committee at the end of 2020, with the aim to start implementation in 2021. The Group will continue to extend this methodology to other business lines in 2021.

• Preventing human rights risks in Qatar

VINCI is present in Qatar through Qatari Diar VINCI Construction (QDVC). Since 2007, QDVC has taken concrete action to improve migrant workers' living and working conditions and to fight forced labour at every stage in the migration cycle. It has also implemented innovative initiatives to combat human rights abuse. QDVC has acted in the interests of not only its employees, but also of temporary workers and the employees of its subcontracting partners. In particular, QDVC regularly audits the working and living conditions of subcontractor employees. More details about these audits can be found in paragraph 4.4.2 of this chapter, "Measures to assess the situation of subsidiaries, subcontractors and suppliers".

In general, VINCI and QDVC strive to significantly advance human rights risk prevention in collaboration with multiple stakeholders, including trade unions, universities, NGOs and international organisations. Their work has led, in particular, to a tripartite framework agreement on workers' rights between VINCI, QDVC and Building and Wood Workers' International (BWI). It was signed at the International Labour Organisation (ILO) headquarters in the presence of ILO's Director-General. The agreement and the latest joint audit report are both available to the public. In 2020, VINCI created a page on its website to make its human rights action in Qatar and all related documents easily accessible (<https://www.vinci.com/vinci.nsf/en/item/qatar.htm>). The Group reports transparently on its practices. The latest report by Business and Human Rights Resource Centre (BHRRC), an NGO, ranks VINCI/QDVC first among Gulf companies, based on its transparency regarding recruitment practices, remuneration, living conditions, freedom of movement, health and safety, workers' representation, prevention of risks relating to subcontracting and consultation and grievance mechanisms (<https://bit.ly/3sE9wLN>). VINCI's full survey answers on all these issues can be read via the following link: <https://bit.ly/2XU80af>.

The following paragraphs focus more specifically on VINCI's action with respect to recruitment practices, employee representation and preventing psychosocial risks.

Preventing risks relating to recruitment practices

To fight debt bondage, a major factor contributing to the vulnerability of migrant workers in Qatar, QDVC has set up robust processes to monitor recruitment agencies in countries of origin (Bangladesh, India, Nepal, etc.), with specific rules governing the costs covered by QDVC. To monitor the process, QDVC employees have travelled to these countries on several occasions to verify agency compliance with rules, spread the information among applicants that recruitment is free, examine the actual working conditions offered and participate directly in recruitment interviews. In addition, various surveys have been carried out among workers to check that measures have been appropriately implemented and, in particular, to find out if any workers did ultimately pay fees to third parties, despite the efforts deployed. What these surveys have shown over the years is that the measures implemented by QDVC have resulted in a clear reduction of these risks.

VINCI works with multiple stakeholders to address these complex issues. QDVC has participated in academic research, receiving public recognition for its initiatives. QDVC was the only Qatari company to open its doors to researchers from Stern Center of New York University as part of a study on ethical recruitment. Based on quantitative and qualitative information provided by QDVC and interviews with workers, labour suppliers and subcontractors, the report acknowledged the effectiveness of the due diligence measures in place. It also concluded that the ethical recruitment of migrant workers could be achieved at a cost of less than 1% of the project's overall cost and that it contributed to other benefits such as a higher rate of retention, a stronger bond with the company and higher satisfaction rates among migrant workers.

QDVC is continuing its efforts to improve the recruitment practices of subcontractors and placement agencies through a public-private partnership signed with the ILO Project Office in Qatar, as part of a pilot project between the ILO Project Office and the State of Qatar, in May 2018. It aims to create a migration corridor between Qatar and Bangladesh with no recruitment fees for workers. For the project, following an initial audit performed by the NGO Vérité, a complete capacity-building programme was rolled out for recruitment and placement agencies in home countries. Programme participants included recruitment and placement agencies in Bangladesh and Qatar, the ILO and the Ministry of Administrative Development Labour and Social Affairs (ADLSA) and the Fair Hiring Initiative. Follow-up meetings to provide support throughout the programme have been held in Dacca and Doha. From August 2019 to October 2020, an independent survey of 333 workers was conducted to assess how this ethical recruitment had impacted them and their employers.

A sample of workers recruited before and after the pilot project were interviewed prior to migrating to Qatar, and again 10-12 months after arriving and working in Qatar. Although the pandemic caused a slight delay in the finalisation of the study, the results will be published in early 2021. The publication will study the following impacts in particular:

- the risk of the workers' paying recruitment fees and related costs;
- working conditions and workers' ability to protect their own interests;
- workers' perceptions of their migration experience.

The capacity-building workshops and the continuous support provided by QDVC, the ILO and the Ministry resulted in an immediate and profound improvement of placement agency practices. These agencies began communicating more effectively at each step in the recruitment process, from the pre-recruitment interview to after the worker's arrival in the host country, to ensure the success of the fair recruitment model. They set up a robust grievance handling procedure using clearly written policies, innovative procedures, and dashboards tracking the number of grievances and their resolution. Placement agencies improved the drafting and terms of contracts with recruitment agencies in home and followed the use of subagents more closely, in particular by providing a transparent breakdown of costs.

Reinforcing employee representation

QDVC took steps early on to provide employee representation and encourage and strengthen social dialogue in the company. A workers' committee was formed as of 2011 and has gradually expanded its powers and scope over the years. It discusses issues such as working conditions, wages, living conditions and health and safety. In November 2016, QDVC held Qatar's first-ever election for employee representatives, in which 4,800 employees voted. The company had communicated extensively on the election prior to the event. A new Workers' Welfare Committee election took place in January 2019, with an increased participation rate of 84%. Representatives from BWI, French trade unions and VINCI observed the election process during their joint audit. BWI published a video of the proceedings on its website. The next election will be held in early 2021, at the end of the current two-year term. The QDVC Workers' Welfare Committee and the committee of representatives of administrative staff each met five times in 2020.

In accordance with the terms of the 2017 framework agreement, BWI has continued to train employee representatives in Doha, with support from QDVC and VINCI, as well as some of QDVC's subcontractors' employees, as of 2019. QDVC has formally requested that all its subcontractors and labour suppliers facilitate the free election of workers' committees in their organisations. This issue is examined during audits of human rights performance and living conditions. QDVC offers assistance to its subcontractors in achieving this step. The ILO Project Office in Qatar has invited QDVC to various working groups to share its experience with other companies in Qatar.

Preventing psychosocial risks

In partnership with Eutelmed, QDVC created an innovative psychosocial risk prevention programme that gives employees access to individual or group sessions with a psychologist and an emergency hotline. Confidentiality is ensured. QDVC's employees have been trained to provide psychological first aid in a crisis event and recognise signs of post-traumatic stress disorder (PTSD).

In 2020, QDVC also called on Eutelmed for assistance in helping employees cope with the impacts of the Covid-19 pandemic on their work and personal lives. Two specific training courses were delivered to managers and health workers (in-house counsellors, doctors and nurses). Videos were developed to teach workers strategies for stress and anxiety management. Other measures implemented by QDVC in their management of the health crisis are covered in its public response to the 2020 survey conducted by an NGO, Business & Human Rights Resource Centre (BHRRC) (<https://bit.ly/3qDNuH1>).

4.4.4 Alert mechanisms and processing of reports

Multiple procedures exist by which employees can report concerns. These grievance procedures include contacting human resources departments, health and safety representatives, line management superiors or employee representative bodies. If confidentiality is a concern, employees can also approach the ethics officers of the Group's business lines and divisions or at Group level.

Although the Group has a system in place (see paragraph 4.6, "The Group's system for whistleblowing, alerts and the processing of reports"), in light of VINCI's multi-local organisation and the nature of its activities, the implementation of local complaint channels is also encouraged. The Group's view is that grievance procedures, including those initiated by end users or local residents, are more effective when they are local, since the company, project or worksite is then better positioned to proactively handle reports, identify any weak areas, improve processes and reinforce prevention. A number of Group companies, operating in many different countries, have set up alert mechanisms in addition to hierarchical channels to report behaviours or situations that present a risk, such as a human rights risk. These companies are located in Latin America (Mexico, Colombia, Argentina, Brazil), Australia, North America (Canada and the United States) and Europe (Greece, Albania, Germany, the Netherlands, Sweden, Poland, Spain, the United Kingdom, etc.). The alternative alert mechanisms include a dedicated email address, hotline or digital solution. Some companies, such as LISEA in France and Lamsac in Peru, have a contact point for the public on their websites. Others outsource the processing of reports to an independent body. This is the case for Seymour Whyte in Australia as well as Lamsac.

Local procedures are sometimes adapted to very specific contexts and involve independent bodies. In Qatar, in addition to existing internal systems enabling workers to report concerns, in their own language, to the CSR or QSE officer or to the Workers' Committee, an independent grievance procedure was created at the end of 2017. Employees of QDVC or its subcontractors can approach Building and Wood Workers' International (BWI), which then informs QDVC or VINCI. This independent channel has proven effective, since BWI has already handled complaints from employees, including those of subcontractors.

Although VINCI entities are sometimes the customer, they are also very often in the role of the subcontractor or service provider for customers in the public or private sectors. In these situations, Group entities are encouraged to participate in the processes put in place by their customers.

4.4.5 Monitoring of the implementation and effectiveness of measures

To complement the information in this section describing the measures that have been implemented, quantitative data is provided here. The Group's initiatives are reaching a growing number of workers, in more and more countries, and at more levels. Measures are implemented in all subsidiaries operating in the same country in order to facilitate dialogue among the businesses and promote consistency. Due to the pandemic, the pace of assessments has slowed and some scheduled evaluations have had to be postponed to 2021. Nevertheless, VINCI continued to spread awareness of these initiatives, to integrate and disseminate guidelines, to develop and communicate on tools, and to advance ongoing projects, such as responsible subcontracting in France, pilot projects in Qatar, and others presented in this document. Work also focused on the development of a responsible purchasing procedure and will be intensified in 2021.

Some business lines and divisions have also created indicators to monitor the deployment of human rights initiatives and assess their impact. For example, VINCI Construction Grands Projets developed indicators using the results of project assessments performed by a dedicated officer. The indicators are monitored and presented monthly to the management committee. They track assessments and their follow-up, as well as trends in results and corrective actions. Currently, priority is given to projects located in the countries with the highest risk, according to the VINCI risk map, which takes into account eight international indicators (see paragraph 4.4.1). To date, VINCI Construction Grands Projets has conducted human rights audits on 18 projects or subsidiaries in 12 countries. If an action plan is in place, it is regularly monitored with the aim of continuous improvement, and follow-up inspections or repeat audits are carried out.

Human rights assessments in the Group ^(*)

- 67 Group subsidiaries in 26 countries assessed since 2018
- More than 17,000 employees in the Group covered by human rights assessments conducted since 2018, amounting to 14% of the Group's workforce outside of France and 34% of its workforce in non-OECD member countries
- 46% of the workforce in high-priority countries identified by the Group in 2020 covered by human rights assessments conducted to date, with the goal to achieve 100% coverage

^(*) The 2020 action plan is based on data at 31 December 2019.

4.5 Duty of vigilance with regard to the environment

For many years now, VINCI companies have implemented measures and processes to avoid or reduce the environmental impact of their activity in the countries in which they operate. VINCI has introduced a new environmental ambition, which extends the environmental actions of VINCI companies beyond regulatory compliance.

With regard to the environment, measures to identify and prevent risks are closely tied to the operational context of companies, their activities in the region and the vulnerability of the surrounding area. This document presents Group-level environmental initiatives and how they are implemented at the operational level, to align with these specific characteristics.

VINCI's duty of vigilance approach and the measures that are taken reflect Group policy, with the aim of continuous improvement. VINCI's decentralised management model encourages companies to make their own commitments, tailored to their activities and geographies. In 2020, the Group's entities translated VINCI's environmental ambition into road maps that take the specific issues they face into account.

4.5.1 Mapping of the Group's major risks

a. Identification of VINCI's material issues

The Group identifies the material environmental risks for its activities using risk mapping. For this task, it collaborates with an outside provider to ensure that the mapping is thorough and that the methodology is valid. The initial risk map, developed in 2017, was revised in 2019 and will continue to be updated every two years. Based on an analysis of VINCI's main business lines, the risk map assesses the environmental risks that could result from the activities of the Group's companies. To measure the vulnerability of these activities to the physical risks associated with extreme weather events looking ahead to 2050, the Group used data from the RCP 4.5 scenario in the IPCC's Fifth Assessment Report. Since 2017, risk mapping has been carried out in collaboration with the environmental managers of VINCI companies in the following manner:

- all the environmental risks that could arise all along the value chain of VINCI's activities were identified, based on a materiality assessment, industry knowledge and complementary bibliographical research. Approximately 15 inherent environmental risks were thus revealed;
- the business lines' environmental managers rated these risks against three criteria: severity, probability of occurrence and degree of control (based on existing governance, processes and tools to manage the risks);
- the ratings made it possible to group together inherent and residual environmental risks at Group and business-line levels.

VINCI has continued its risk mapping exercise to determine specifically which operational activities and environmental aspects, from among the Group's main businesses sorted into 15 categories, contribute to the main environmental risks presented in its risk map. Using this activity-based analysis, action plans can be adapted and rounded out to precisely target the identified operational risks. The Group's Environment Department coordinated the work, with the input of the environmental managers and operational directors of the relevant businesses.

Other factors affect environmental risks, such as geography or the impact of joint ventures. Accordingly, VINCI undertook the work needed to identify the main environmental risks for each country where the Group is present. Its environmental index is the average of nine environmental indicators: biodiversity and protection of marine areas; biodiversity and protection of land areas; exposure to climate change; vulnerability to climate change; deforestation; environmental regulatory framework; waste management; water pollution; water depletion. VINCI also produced a map positioning its countries of operation based on local environmental regulations.

b. VINCI's material issues

The material environmental issues on which the activities of VINCI companies may have a significant impact were sorted into three categories. The categories span the entire project life cycle, from the response to the call for tenders to the preparation of sites and construction, through to the operation phase. Subcontractors and suppliers are also taken into account.

Major issues	Description	Main risks
Climate change	Three types of activity contribute to energy consumption and greenhouse gas emissions: - production and use of raw materials (aggregates, asphalt mix, concrete, steel etc.) for projects; - transport of materials, employees and customers of the concession infrastructure under operation (motorways, airports); - operation and maintenance of the infrastructure and buildings. In addition, some projects contribute to urbanisation and the loss of natural land, which may have an influence on the occurrence and consequences of extreme weather events (floods, heatwaves, etc.).	- Contribution to climate change - Intensification of extreme weather events
Resources and the circular economy	The construction sector consumes significant quantities of raw materials (sand, steel, bitumen, wood, aggregates, etc.). The production, processing and disposal of waste resulting from the Group's activity and that of its suppliers are a source of greenhouse gas emissions, create risks of deterioration of natural environments and constitute a nuisance for local populations, while contributing to the depletion of certain raw materials.	- Depletion of natural resources - Risks related to waste production, processing and disposal
Natural environments	The construction and concessions activities of VINCI can have short-, medium- and long-term impacts on natural environments, habitats and species. Projects may also pose a nuisance for local residents.	- Water pollution - Noise pollution - Soil pollution - Air pollution - Light pollution - Soil depletion, erosion and loss of natural land - Damage to and destruction of species - Deterioration of natural environments - Depletion of water resources

In addition to assessing and reducing how its activities impact climate change, VINCI also studies the risks and opportunities that climate change brings to its activities. It performed risks and opportunities analyses in the context of long-term scenarios in 2017 and again in 2020. In addition, entities undertake specific work to anticipate and manage risks in the short- or medium-term that have been identified as major for their projects.

In 2017, VINCI measured the vulnerability of its activities to the physical risks associated with extreme weather events looking ahead to 2050, based on data from the RCP 4.5 scenario in the IPCC's Fifth Assessment Report. This analysis served to identify the main risks for the Group's activities, as well as the different risk management strategies available and their suitability. It showed that as a global builder and operator of infrastructure, VINCI is highly exposed to the acute physical risks associated with climate change. Extreme weather events can negatively impact the Group's activities in different ways, such as damage to worksites or flooded runways. VINCI's activities may also be severely impacted by longer-term climate change, such as temperature increases. Because a significant portion of VINCI's activities take place outdoors, its employees are sometimes confronted with extreme weather conditions. To ensure the Group's compliance with the laws and regulations of the countries where it operates, working conditions are closely monitored, especially with respect to variations in temperature (high or low). Changes in temperature can alter the behaviour of certain construction materials, so additional research and development work may be required to guarantee the same level of quality to customers. High temperatures can also affect traffic patterns where VINCI operates motorways, airports, stadiums and other infrastructure under concession contracts.

In 2019, the Group put the climate emergency at the centre of its environmental ambition. VINCI is always looking to identify and manage the related risks and opportunities more effectively. In 2020, it developed forward-looking low-carbon scenarios in order to anticipate potential changes in its markets looking ahead to 2050. Two main scenarios were analysed, based on two possible pathways that would keep global warming below 2°C by the end of the century. Three sector models for Europe were built, one for each of VINCI's main business sectors (buildings, mobility and energy). Additional models are being developed, including one focusing on the construction sector in France and another focusing on mobility in North America. VINCI's business lines were involved in every stage to build these scenarios and are now working to take their results on board so that they can support strategic decisions by their executive committees. Based on the results of this scenario analysis, the main climate-related risks to which VINCI is exposed, and whose exposure is expected to increase in the future, have been identified and grouped into, on the one hand, regulatory risks and, on the other, technological and market risks. As a group operating across a broad range of sectors, VINCI must comply with a large number of climate regulations. These include cap-and-trade emissions trading programs – which can affect VINCI activities that emit greenhouse gases, especially Eurovia's carbon-intensive manufacturing businesses – and energy efficiency standards and regulations for buildings. As a construction industry leader, VINCI must supply products that meet these standards. Non-compliance with regulations could expose VINCI to financial penalties, among other sanctions. Furthermore, GHG emissions regulations are expected to increase in the future and impose stricter rules on carbon-intensive businesses.

VINCI's technological and market risks mainly related to its products and services that are relatively carbon-intensive, either due to direct emissions (from consuming GHG-emitting materials such as concrete or bitumen) or indirect emissions (through the traffic associated with managed infrastructure, for example). Although VINCI's research and development efforts are focused on creating low-carbon and energy-efficient products and services, there is a real and growing risk of a competitor developing alternatives, resulting in a fall in demand from customers. In addition, a failure to make the necessary effort to reduce the impact associated with its activities could negatively impact the Group's reputation, not just among its customers but also investors and financial markets, thereby affecting its financial capacity.

The key lessons from this scenario analysis have confirmed VINCI's belief that urgent action is needed and that profound changes are in store for its businesses. These major transformations will bring risks, but also opportunities. The long-term prospects of the Group's activities and their continued market leadership will depend on their ability to recognise and anticipate these risks and opportunities. VINCI's entities are taking major steps to meet this challenge.

4.5.2 Procedures for assessing the situation of subsidiaries, subcontractors and suppliers

a. Assessing the situation of subsidiaries and subcontractors

Multiple environmental assessment processes are in place in the Group to fulfil regulatory requirements, meet stakeholder expectations and comply with internal company policies. Risk identification and analysis is the very first principle laid out in the environmental guidelines that were signed by Xavier Huillard, Chairman and Chief Executive Officer of VINCI, and Roberto Migliardi, Secretary of VINCI's European Works Council, on 6 November 2020.

• Environmental certification

Implementing an effective, ISO 14001-certified environmental management system is the most common environmental assessment process undertaken by Group entities. Environmental management systems guarantee a robust level of risk prevention and management with annual external audits. The percentage of the Group's activity covered by ISO 14001 certification is calculated in relation to revenue or another relevant indicator, depending on the business line (see paragraph 3.1.1.2, "Turning risk management into opportunity", page 217).

ISO 14001 certifications at VINCI in 2020

- VINCI Autoroutes: 100% of kilometres in service
- VINCI Concessions: 77% of revenue
- VINCI Energies: 48% of revenue
- Eurovia: 26% of revenue from works activity, 53% from quarries owned, 38% from coating plants owned, 64% from binder plants owned
- VINCI Construction: 85% of revenue, including 100% of revenue from Sogea-Satrom branches, for example

• Third-party controls

The activity of the Group and its subcontractors is also regularly reviewed by other external bodies:

- government agencies carry out inspections to ensure compliance with regulations on worksites;
- customers and contracting authorities order design offices to conduct environmental audits of worksites on a regular basis, to monitor compliance with the Group's regulatory and contractual obligations;
- nearby residents and local civil society organisations increasingly scrutinise construction worksites and quarry sites, especially when a consultation process has been established that enables partner organisations to visit the site and verify that the commitments made are being fulfilled;
- financial institutions and international financing providers sometimes take special measures to monitor projects with a high risk of environmental impact;
- more specifically, independent design offices perform audits on worksites to check compliance of waste storage, processing and disposal procedures.

When these audits or monitoring processes reveal nonconformities, the onus is on the companies responsible to explain the shortcomings and promptly correct them.

• Internal controls

VINCI's business activities also undergo internal controls on a regular basis. Group companies measure the environmental footprint of their projects and activities and report on the internal and external resources implemented to protect the environment. Regardless of whether these activities are performed by VINCI or its subcontractors, regular inspections are carried out by the environmental correspondents.

At Group level, environmental issues are a core part of VINCI's risk assessment criteria, which were reinforced in 2020 (see paragraph 2.4.3, "Procedures related to commitments and the VINCI Risk Committee", page 215).

When certain worksites present a high risk of environmental impact, in particular with regard to local biodiversity, environmental managers partner with ecologists (specialised design offices, research institutions or non-profit organisations) to increase monitoring. VINCI Construction Terrassement has rolled out an initiative called Actons la Bionécossité which provides for an initial environmental assessment of every site before work begins and the monitoring of all impact management action taken.

Additional analyses and various controls may be carried out at the subsidiary or project level.

Business line	Examples of internal controls
VINCI Autoroutes	<ul style="list-style-type: none"> - Inspection of measures to protect wildlife around motorways and supervision and monitoring agreements with many local and national organisations, such as the Bird Protection League (LPO) - Inspection of work performed by specialised providers (including environmental performance) - Publicly-released assessments of socio-economic and environmental impacts, called "LOTI audits", established by the French domestic transport planning law (Law 82-1153 of 30 December 1982), for new transport connections
VINCI Airports	<ul style="list-style-type: none"> - Environmental due diligence by specialised firms for projects under development in order to analyse and manage environmental risks at the earliest possible stage of a project
VINCI Energies	<ul style="list-style-type: none"> - Risk assessments and a health, safety and environment regulatory watch, centralised on an internal tool designed for VINCI Energies companies - Use of Preventeo by VINCI Energies companies in France to obtain consolidated compliance results and translate non-conformities into measures for inclusion in action plans
Eurovia	<ul style="list-style-type: none"> - Assessment of environmental risks for activities being acquired or for investments in quarries or production plants - Regular internal audits as part of the "The Way We Work" quality initiative to ensure that entities have incorporated environmental action plans into their strategic business plans - Regulatory compliance audits (127 in France in 2020) - Environmental acceptability audit developed specifically for production plants in 2019 and 2020 - Regulatory watch developed using a tool specific to Eurovia's businesses
VINCI Construction	<ul style="list-style-type: none"> - Internal audits of worksites applying for the Attitude Environnement label (VINCI Construction France) - Internal assessment of environmental risks for each project, using a questionnaire based on local regulations and ISO 14001 (VINCI Construction Terrassement) - 45 internal compliance audits in 2020, using a set of 100 items to assess worksite performance (VINCI Construction Terrassement) - Audits of subsidiaries and subcontractors, with the requirement for subcontractors to provide an environmental risk analysis and environmental protection plan - Assessments of subcontractors, suppliers and partners after completion of their work, using a dedicated internal tool (Dodin Campenon Bernard) - Annual environmental audit (incorporated into the integrated management system) for all divisions, which are all ISO 14001 certified, and monthly HSE (health, safety and environment) inspections by management for each project (Sogea-Satrom)
VINCI Immobilier	<ul style="list-style-type: none"> - Quality audits carried out systematically at all residential property worksites, for example in compliance with VINCI Immobilier's charter for clean worksites

b. Assessing the situation of suppliers

As indicated in paragraph 2.2.3, "Taking social and environmental criteria into account in the Group's purchases", page 212, the responsible purchasing task force developed and shared a process to evaluate how suppliers and subcontractors manage the following environmental risks: climate change, depletion of resources, loss of biodiversity and pollution. The Responsible Purchasing Committee built a sample risk assessment checklist, based on purchasing category, and conducted detailed analyses, using risk maps, of relevant challenges and risks to produce a non-financial assessment specific to a given purchasing category. Based on these assessments, a supplier may be excluded from a tender process or an action plan may be proposed, together with measures to verify its implementation. In 2020, VINCI used these tools to assess responses to eight calls for tenders, amounting to €900 million of annual spending in these purchasing categories. Working together with the responsible purchasing team, the Group Purchasing Department has incorporated a specific non-financial questionnaire into their tender processes. In addition, the VINCI holding company and some Group entities may carry out audits of their suppliers, focusing on specific purchasing categories, often selected because of the associated risks.

For local purchases, special attention is paid to materials suppliers, in particular by asking them to provide information on their environmental footprint, such as CO₂ emissions or the use of bio-based materials, during the selection process. Increasingly, preference is given to suppliers that integrate environmental protection in their practices, and suppliers' practices are regularly audited in this respect, particularly when contracts are up for renewal. At VINCI Construction France, environmental data modelling tools for construction materials have been developed in collaboration with engineers from the École des Ponts ParisTech to assess the exact environmental footprint, especially the greenhouse gas emissions, of the concrete used in its projects. The aim is to be able to generate data that its teams can use for their life cycle analysis calculations.

Additional measures are taken by business lines and subsidiaries, for example:

Business line	Examples of supplier assessment
VINCI Autoroutes	<ul style="list-style-type: none"> - Due diligence during consultations - Supplier audits including sustainability criteria - Supplier assessments during performance, using dedicated internal tools, and sharing of results at meetings - Collaboration with suppliers on environmental issues (such as products used for road maintenance) - Initial and follow-up assessments of selected suppliers in the Cofiroute network (questions incorporating environmental issues). - Assessment of environmental suppliers (providing programme management assistance) in 2020
VINCI Airports	<ul style="list-style-type: none"> - Environmental clauses to be included in contracts with third parties
VINCI Energies	<ul style="list-style-type: none"> - Assessment criteria for electrical and telecommunications equipment suppliers, mainly regarding their carbon footprint, updated in 2020, and calculation of emissions from purchases (upstream and downstream Scope 3 emissions) - Assessment of VINCI Energies suppliers, using the Actradis platform
Eurovia	<ul style="list-style-type: none"> - New questionnaires for specific purchasing categories developed in 2020 to assess suppliers' environmental and other commitments. The questionnaires were sent to all suppliers having participated in a tender in 2020, to distinguish the best environmental performers. Improvement action plans were developed jointly with suppliers. Fifty suppliers, representing a purchasing volume of €250 million, received support in this form in 2020, in connection with framework agreements managed by Eurovia's head office.
VINCI Construction	<ul style="list-style-type: none"> - Assessment of suppliers, subcontractors and partners upon completion of their service using a dedicated internal tool that includes an environmental evaluation (VINCI Construction Terrassement and Dodin Campenon Bernard). In 2020, 218 environmental assessments were performed at VINCI Construction Terrassement out of a total of 317 suppliers, subcontractors and partners. - Environmental criteria included in annual assessments of subcontractors and suppliers (Sogea-Satom)

4.5.3 Tailored actions to mitigate risks or prevent serious impacts

a. Policies and procedures to prevent and mitigate risks in operations

To address the major issues identified for VINCI's business activities, the Group's environmental ambition for 2030 has been translated into key targets and action plans in three areas: climate change, the circular economy and the preservation of natural environments. The Group's entities are implementing this ambition by building road maps that are aligned with their business activities and using environmental management systems.

Issue	Objectives and actions
Climate change	<ul style="list-style-type: none"> - Follow a trajectory to help limit global warming to 2°C, involving a 40% reduction in direct greenhouse gas emissions (Scopes 1 and 2) by 2030 compared with 2018 levels - Reduce indirect emissions by taking action across the entire value chain for the Group's business lines - Adapt structures and activities to improve their climate resilience
Resources and the circular economy	<ul style="list-style-type: none"> - Promote the use of construction techniques and materials that consume less natural resources - Improve sorting to systematically recycle and recover waste - Increase the availability of recycled materials in order to reduce the extraction and use of virgin materials
Natural environments	<ul style="list-style-type: none"> - Avoid environmental nuisances and incidents by implementing an environmental management plan in all businesses - Optimise water consumption, especially in areas of water stress - Aim to achieve no net loss of biodiversity

• Environmental management and incident prevention

In support of the Group's environmental ambition, local environmental management systems enhance risk prevention at Group entities (see paragraph 3.1.1.2, "Turning risk management into opportunity," page 217), including their worksites and sites under operation. For example, VINCI Immobilier applies its own clean worksite charter to all office buildings for which it handles property development, financial engineering and technical maintenance. The document enumerates obligations for all companies operating at the worksite, in terms of measures to be taken to monitor and reduce nuisances and environmental impacts. One VINCI Construction entity, Sogea-Satom, develops and implements an environmental management plan for each project. The plan lays out the procedures to follow in the event of a pollution incident and includes the monitoring of environmental near misses. Another entity, Soletanche Freyssinet, reports environmental incidents using an internal solution, BeSafe, which features an alert system and tracks corrective action. VINCI Construction Grands Projets has set up a process to monitor health and safety and environmental incidents and accidents, which defines four impact or nuisance levels (minor, significant, very significant, major). Eurovia developed Notify, an application to report environmental incidents at fixed sites and worksites, several years ago. In 2020, it used this experience to add a new incident-reporting module called Events to its in-house management solution, E-Cube. In addition to reporting, Events also analyses incidents and suggests measures to reduce their environmental impact.

In the Concessions business, VINCI Concessions is working to enhance risk prevention by expanding ISO 14001 certification across airports and other concessions, which requires:

- a regulatory watch and compliance assessment process;
- an assessment of significant environmental aspects and impacts during normal operations and in the event of an incident;
- preventive systems to reduce risks (containment pallets under hazardous products, for example);
- clear procedures and training to ensure that workers are informed and fully prepared to respond effectively in the event of an incident;
- drills to practise responding to emergency situations.

VINCI Autoroutes also set up a procedure to manage pollution incidents on motorways or other sites, which is continuously improved based on feedback from incidents and emergency drills. Different players work together to implement the procedure:

- a network of operators at traffic control centres, who share information about the situation and coordinate a response;
- an on-call chain of people in command, who make decisions while the incident is being managed;
- the operational staff at the site, who directly handle the incident.

In addition to these systems, the majority of which are ISO 14001 certified, VINCI's business lines, divisions and subsidiaries participate in initiatives and develop labels to prevent risks that are specific to their activity. In 2020, eight of Eurovia's worksites had obtained its in-house label Environmental Excellence, based on five criteria: protection of soil and water resources, the fight against climate change, waste management, recycling and reuse, biodiversity preservation and responsiveness to local residents' needs. VINCI Construction Terrassement created a green worksite label in 2014 ("Chantier Eco-responsable"). It distinguishes worksites that roll out a minimum of five ambitious initiatives to protect the environment or preserve biodiversity, going well beyond regulatory compliance, and is based on a full-day audit of the worksite, staff and local management. In 2020, seven VINCI Construction Terrassement worksites received the label.

Furthermore, business lines conduct awareness-raising and training initiatives (see paragraph 3.1.2, "Employee training and awareness", page 219). Regular 15-minute environmental sessions at worksites build awareness among employees and subcontractors alike. In 2020, 52,891 training hours were devoted to environmental issues, a 26% increase over 2019. A new e-learning module on the environment was created in 2020 and made available to all employees to help them:

- understand the Group's environmental ambition;
- be aware of the environmental issues affecting the Group's business activities;
- identify how they can each contribute to VINCI's ambition, no matter what their role in the Group.

• Mitigating and adapting to climate change

Climate change is already a reality: global temperatures have risen by more than 1°C compared with pre-industrial levels, leading to increasingly frequent and intense extreme weather events each year, with major economic and social consequences. According to the climate models published by the Intergovernmental Panel on Climate Change (RCP scenarios 6.0 and 8.5), current production and consumption practices could see temperatures rise by around 3.5°C to 5°C by the end of this century, resulting in major and irreversible shifts that could affect all aspects of society.

In response to the many reports about environmental degradation published by the scientific community – in particular, special reports by the IPCC – VINCI has committed to taking concrete action. In 2019, the Group set the goal to reduce its direct greenhouse gas emissions (Scopes 1 and 2) by 40% by 2030 compared with 2018 levels. This trajectory is aligned with a global warming limited to well below 2°C, in accordance with the Paris Climate Agreement. The Group is also taking steps to reduce its indirect emissions throughout its businesses' value chains, by developing green solutions or using low-carbon materials.

To meet its objectives, VINCI is developing tools specifically for its businesses to help them measure and manage all the greenhouse gas emissions associated with their activities (ISO Scopes 1, 2 and 3). The Group carried out extensive work in 2020 to identify and measure its businesses' indirect value chain emissions (Scope 3) more accurately.

Each business line has developed and implemented climate change action plans aligned with their activities to reduce the Group's direct greenhouse gas emissions. Some measures are being implemented by all Group companies: gradual increase of electric power for the light vehicle fleet, training in eco-driving practices, modernisation of site machinery and heavy vehicle fleets, experiments with low-emission technologies, and the increased use of electricity from renewable sources. Others are being implemented by specific businesses. They include the replacement of heavy fuel oil by natural gas in industrial processes (Eurovia), the use of warm-mix and cold-mix asphalts (Eurovia), regulation of temperature in buildings and terminals (VINCI Energies, VINCI Concessions), testing the use of biogas fuels for some utility vehicles (VINCI Autoroutes), improved energy efficiency of worksite facilities (VINCI Construction), and the production of solar power for self-consumption (VINCI Airports).

Ensuring the energy efficiency of buildings under construction or renovation is a key objective for the Group. VINCI Construction's companies have shown that they are able to meet the building industry's highest standards, obtaining labels and certifications that go beyond regulatory compliance. They can ensure the actual energy performance of buildings (through the Oxygen® label, attributed to 80 buildings in France), in line with the energy efficiency guarantee applied by VINCI Energies to the operation phase. Using eco-design software developed in partnership with the Mines ParisTech engineering school, VINCI Construction teams also offer solutions for predicting and managing the energy consumption of delivered buildings. VINCI Construction companies therefore embed energy efficiency into a building's entire life cycle.

Working proactively to adapt buildings to extreme weather events and developing technical skills and knowledge to reinforce building structures are a core part of solutions to climate change challenges. VINCI has conducted research on issues including flood prevention, adapting neighbourhoods to heatwaves and managing the urban heat island effect. The Resalliance startup is an in-house design office providing consulting, modelling and project management services to help projects and geographies adapt to climate change.

• Raw material conservation and waste reduction, recycling and reuse

To support the circular economy, VINCI companies strive to reduce their consumption of raw materials and to limit, sort, recycle and reuse an increasing share of the waste produced by their activities.

The rollout of recycling platforms for materials, especially inert materials, supports the circular economy by allowing for their reuse on worksites of the Group's companies in a more systematic manner. For example, about 10 years ago, Eurovia launched its Granulat+ programme, which uses innovative treatments and recovery-sorting-recycling facilities to recover the resources needed to produce aggregates. Quarry sites receive all inert excavation material, earthworks and demolition materials from worksites, thereby participating in a materials recycling programme.

Given their extensive international operations, VINCI's Concessions businesses must find alternatives to landfills for treating waste. To meet its goal to send zero waste to landfills, VINCI Airports has built on-site sorting centres for its airports in Brazil and the Dominican Republic. It has also supported the initiative with a programme to raise the awareness of users, employees and subcontractors on waste reduction and sorting.

Nearly **19%**
of recycled asphalt mix in
Eurovia's total production
in 2020

• Preserving natural environments

Preserving natural environments is a key concern for VINCI companies. From a project's earliest design stage, they strive to avoid, reduce and offset the impacts of their activities on species and natural environments. VINCI companies comply with a range of local regulations and requirements of varying complexity. Above and beyond their legal obligations, they systematically undertake risk analyses of their projects and implement measures to manage the identified risks.

A mapping of risks has shown that the Group's activities can cause pollution of various sorts and deteriorate natural environments. Accordingly, the Group has taken steps to reduce these impacts, both during the construction phase and during operations.

Entities use various types of equipment to prevent surface water pollution, choosing the best solution for each context. For example, VINCI Autoroutes creates retention ponds on the sites of its infrastructure to allow the settling of suspended solids in run-off and pumped water, but also to contain any accidental pollution and avoid contaminating neighbouring watercourses or sensitive environments. As another example, 88.8% of VINCI motorways in service in France are equipped with either natural water protection systems or engineering structures that address potential problems to prevent accidental pollution in the surrounding natural environment. In addition, whenever water is discharged into a natural environment, this is done only after its quality has been verified through sampling. In all its airports, VINCI Airports systematically installs oil-water separators wherever there is a risk of water contamination. At some of Eurovia's quarry sites, bamboo has been planted to filter pumped water and minimize the discharge of any suspended matter. At worksites, temporary retention ponds or settlement tanks are set up as needed to prevent suspended solids from contaminating the natural environment. Worksites are also supplied with spill kits, watertight areas for machine refuelling, and other equipment to prevent accidental pollution. Furthermore, to reduce the light and sound pollution generated by the operation of infrastructure, acoustic barriers are regularly placed along motorways, and lighting systems may be adapted to direct light only towards areas requiring illumination for the safety of users. During a project's construction phase, Group entities use acoustic enclosures or ventilation strategies to diminish the noise produced by their machines. Depending on the context, noise levels may be measured, and sometimes vibrations as well.

At sites under construction and sites in operation, air quality monitoring systems may be implemented. Some airports measure the air quality of surrounding areas on a continuous basis. At worksites, operators first make sure that weather conditions are suitable (low wind speeds) before beginning soil stabilisation work.

Efforts are also made to limit the use of phytosanitary products for road maintenance to the strict minimum. Currently, these products are only used for hard-to-access areas or for fighting invasive plant species. From 2019 to 2020, VINCI Airports reduced its consumption of phytosanitary products by 70% (average reduction in quantities consumed, expressed in kilogrammes or litres). VINCI has made a pledge to act4nature international (see paragraph 3.4.1, page 235) to cease all use of phytosanitary products by 2030 (unless prevented by contractual or regulatory provisions).

The Group mobilises internal and external sources of environmental engineering expertise to offset its residual impacts on species. Specific ecological restoration measures are taken only after all possible adaptation strategies have been applied.

70%
reduction in the consumption
of phytosanitary products
at VINCI Airports
between 2019 and 2020

b. Policies and procedures to prevent and mitigate risks among suppliers

The additional risk-mapping work performed in 2019 to examine environmental issues for specific business activities identified the purchasing categories that are the most exposed to environmental risks. These categories include materials and energy purchases, whose early environmental impact is high (due to the depletion of natural resources or the high carbon impact of its production). Other purchasing categories also present significant environmental risks, depending on the business activity.

In 2019, the Group developed and disseminated a practical guide to responsible purchasing. It clarifies that the sourcing of innovative solutions to protect the environment, fight climate change and achieve energy transition is an integral part of the Group's responsible purchasing. At the end of October in 2020, an e-learning module was made available for all employees, to introduce them to responsible purchasing and help them absorb the content of the guide. By 31 December 2020, 800 employees had completed the module. A more advanced training session on responsible purchasing for employees in Group purchasing roles will be developed in 2021. At the business line level, VINCI Autoroutes has developed a responsible purchasing module for all employees who participate in the purchasing process.

Environmental clauses are also included in the supplier contracts signed with some business lines, divisions and subsidiaries. For example, the sustainable development teams at VINCI Autoroutes systematically participate in consultations with suppliers. At ASF, all contracts for the provision of programme management services include one or more environmental clauses, and for all large contracts for works (greater than €500,000) or intellectual services, suppliers must provide a full environmental impact statement. At VINCI Construction, some contracts with suppliers contain environmental requirements and recommendations, in particular regarding low-carbon concrete.

100%

of framework contracts signed by Purchasing Coordination included one or several environmental criteria in 2020

The Group has begun to focus more specifically on certain industry sectors and purchasing categories. Eurovia initiated work in 2020 to identify the most important purchasing categories in terms of environmental issues and will report the results in 2021. In 2020, the Group investigated two sectors in particular: low-carbon concrete, for which it is assessing concrete suppliers against environmental criteria (such as greenhouse gas emission thresholds) and wood. VINCI companies specialising in timber-frame construction source a very large majority (about 90%) of their wood from PEFC- or FSC-certified sustainably managed forests. In 2020, VINCI responded to the CDP Forests questionnaire for the first time, and is now one of the 6,800 companies around the world participating in this disclosure initiative supported by 515 global investors. The Group obtained the score of C and ranks seventh among the 14 participating construction companies, which indicates the Awareness level and highlights the Group's efforts in that area.

4.5.4 Group alert mechanisms and processing of reports

The Group has set up an alert system, using a dedicated online platform, to process disclosures about serious damage to the environment. The system is managed by the Ethics and Vigilance Department. At the same time, the Environment Department monitors major environmental incidents as part of the Group's annual reporting. A major incident is defined as one that requires the intervention of an external specialist and whose consequences stretch beyond the boundaries of the entity's sites.

At the local level, the Group's subsidiaries, divisions and business lines have their own procedures to notify management if an environmental incident occurs so as to promptly implement corrective actions. For example, the environmental managers of construction companies must make a detailed report of any environmental incident. The report is shared with the top management of the relevant company.

- **Eole incident**

In 2019, an incident involving the unintentional spillage of materials into the river Seine occurred at the concrete mixing plant in Nanterre, which supplies the sites for the e-déf Eole-La Défense project. The management of the site immediately took the necessary steps to stop it.

On 11 March 2020, through a pre-trial guilty plea procedure, the court of Nanterre sentenced a subsidiary of VINCI Construction (Dodin Campenon Bernard) to a €90,000 fine, which includes a suspended amount of €40,000, for the accidental spillage of grey water containing sand and traces of cement into the river Seine. The court did not recognise any "intent to spill into the Seine". The VINCI Group has fully assumed its responsibility for this unintentional, abnormal and exceptional incident. It took action to offset damage and support restoration as of the end of 2019. These measures, duly attested by a bailiff, were applied to a total surface area of 310 square metres, although the impacted surface area was only 25 square metres. On 16 December 2020, the organisations having filed a civil action abandoned their case, which was noted by the judge. As a result, the case before the Nanterre court is definitively closed.

4.5.5 Monitoring of the implementation and effectiveness of measures

VINCI's Environment Department, together with the Internal Control, Ethics and Vigilance, CSR, and Purchasing departments, supervises the work to monitor and assess the effectiveness of environmental risk management measures. This follow-up is performed on a continuous basis, through the coordination of internal committees focusing on each of the Group's material environmental issues (the Environment Committee, the Biodiversity Task Force, and the Circular Economy Task Force). Monitoring and assessment are also carried out by the Group's network of environmental correspondents. Among other tasks, these correspondents respond to the annual environmental reporting questionnaire, which contains about 60 quantitative indicators based on Global Reporting Initiative standards (a common set of indicators to assess companies' sustainable development policies). The reporting process is an excellent resource for managing and following up on action taken to reduce the environmental risks relating to VINCI's activities. It also incorporates some data on the subcontractors of VINCI companies.

The monitoring and assessment of environmental risk management measures supports the Group's new environmental ambition, which aims to strengthen the commitments made by Group companies and sets targets for reducing the environmental footprint of their activity. These goals are regularly reviewed by VINCI's Executive Committee and Board of Directors.

99%

of Group revenue is covered by environmental reporting

4.6 The Group's system for whistleblowing, alerts and the processing of reports

• A procedure available to all stakeholders

The Group has set up a unique whistleblowing system, called VINCI Integrity, that can be used by any concerned person to report any serious irregularities relating to the work context, and of which they have personal knowledge. The persons covered by the whistleblowing procedure are:

- employees of companies in the VINCI Group;
- external or temporary employees of companies in the VINCI Group (such as temporary staff or employees of subcontractors, suppliers, service providers, etc.);
- persons who are stakeholders in a project, for subjects relating to duty of vigilance in the environmental and social domains.

• A procedure addressing all areas of concern

Whistleblowing in the work context may involve the following areas:

- behaviour or a situation that infringes VINCI's Code of Ethics and Conduct or its Anti-corruption Code of Conduct;
- behaviour or a situation that infringes VINCI's Guide on Human Rights or is a serious violation of human rights and fundamental freedoms;
- behaviour or a situation that infringes VINCI's "fundamental and essential workplace health and safety initiatives" or will have a severe impact on people's health and safety;
- behaviour or a situation that infringes VINCI's environmental commitments or will have a severe impact on the environment.

• A multimodal procedure

Multiple, complementary channels are available for processing reports. Whatever the means used, all exchanges are kept strictly confidential.

Initially, employees inform their direct or indirect supervisor, or an officer designated for this purpose within the entity to which they belong. They may then use their entity's specific whistleblowing system, if it has one. Employees can also contact the Group's Ethics Officer directly or use VINCI Integrity, the Group's intranet whistleblowing system. VINCI guarantees that none of its employees will be penalised or dismissed, and that no disciplinary action will be taken against the employee, whether directly or indirectly, for having reported or given evidence, in good faith, under the whistleblowing procedure, concerning acts of which the employee obtained personal knowledge during the course of his or her duties. This remains the case even if the allegation made is determined to be false after investigation. Similarly, the identity of the accused person is treated with the utmost confidentiality.

External stakeholders can access VINCI Integrity from the Group's website.

These mechanisms ensure a reliable, highly secure method of reporting with end-to-end traceability.



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