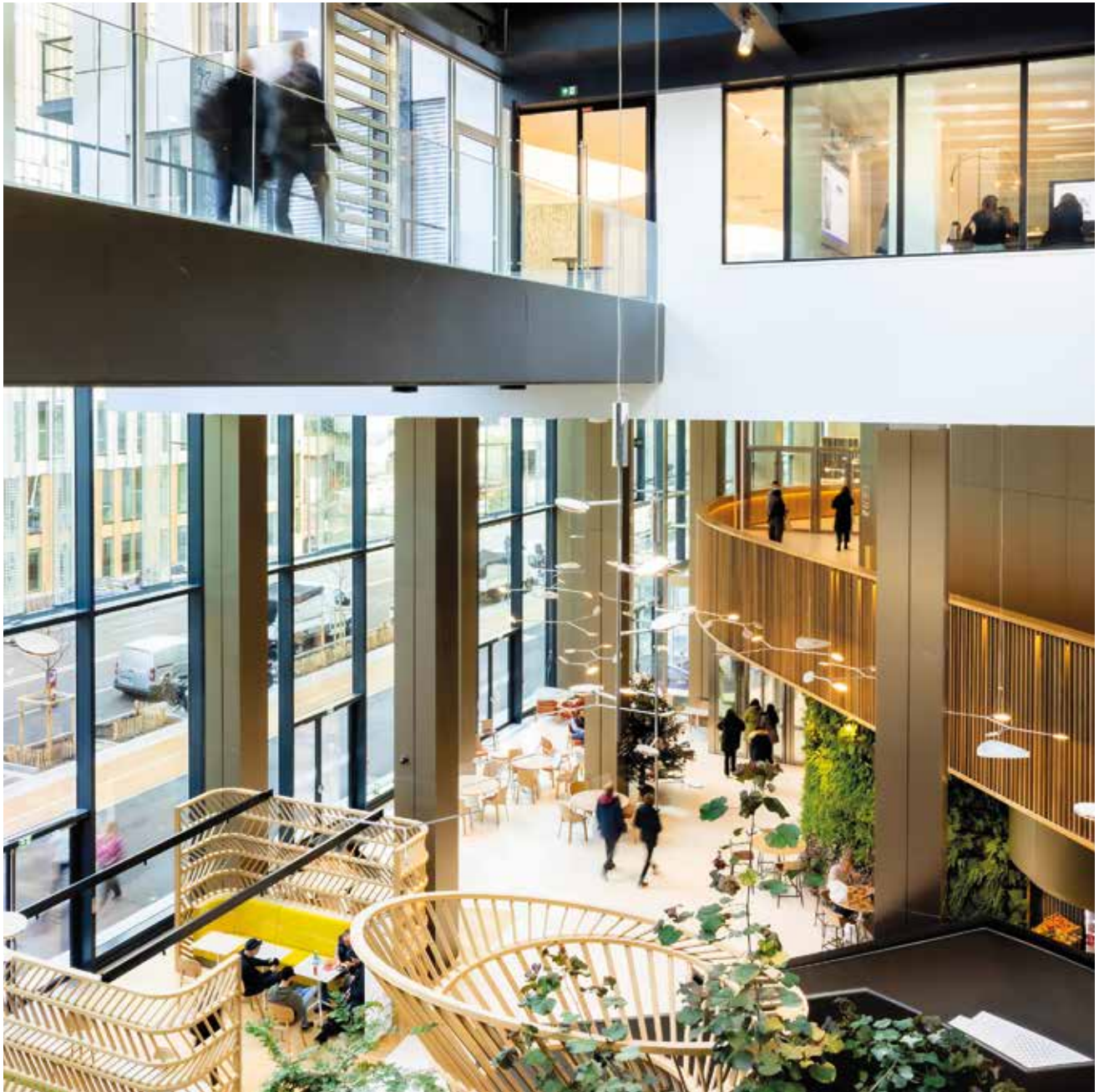


Forging a sustainable world.



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.

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 Code 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.

The Ethics and Vigilance Committee regularly monitors execution of the duty of vigilance plan. This seven-member committee includes five Executive Committee members and is responsible for implementing and updating compliance systems covered by the Code of Ethics and Conduct, notably concerning 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 business activities. The committee meets at least once every quarter. In 2021, it met seven times, including three extraordinary meetings. It reports annually on its work to the Board of Directors' Strategy and CSR Committee.

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

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 are locally based 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.

At 31 December 2021**1,606** companies, of which **67%** have fewer than **100** employees**280,000** worksites and projects in 2021**219,299** employees worldwide in nearly **120** countries**75.6%**
Europe
(45.9% in France)**11.8%**
Americas**6.6%**
Africa**3.9%**
Asia and
the Middle East**2.1%**
Oceania**85%**
in OECD countries

Companies in the Group 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, service providers and subcontractors, also for varying periods of time. The projects they work on can involve anywhere from a few to a few thousand workers, in different geographical areas. Sometimes the Group's companies are the subcontracting companies, but just as often they are subcontractors themselves. In either case, they depend on and must answer to customers with widely ranging requirements and priorities regarding environmental, employment and social issues. They work in continually changing environments, with each project having its own ecosystem. Any action taken must be targeted and adapted to address the project's specific operational, social and environmental issues.

Another feature of the construction, energy and concessions businesses 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 construction and operation sites. 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 197).

36%
of purchases are for
subcontracting services

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, 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 the subcontracting company, they are not always in a position to choose which service providers, techniques and supplies are employed.

34%
of customers are public
sector organisations

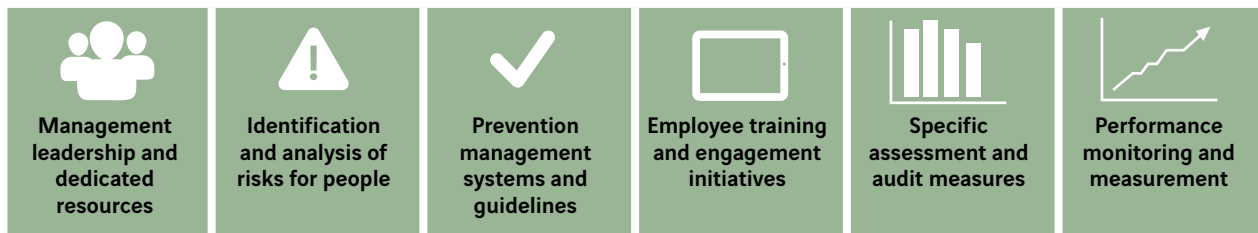
VINCI takes all of these parameters into account in designing and implementing vigilance measures that are relevant and effective with regard to its organisation, business activities and value chain.

4.2 Duty of vigilance with regard to health and safety

As its activities carry inherent risks, health and safety at work is a priority issue for VINCI. The Group's aim is to achieve zero accidents, a goal that applies to all employees and external staff working at construction or operating sites under the control of a Group company. Due to continually changing jobs, materials, equipment, techniques, processes and new technologies, there is a need to continuously reinforce health and safety practices. VINCI not only applies rules and procedures, but also continuously fosters a culture of safety for all. The Group's safety culture permeates every level of the organisation and involves all employees from site teams to managers, including temporary and subcontractor staff.

Additional information is provided in the section on workforce-related information (see paragraph 1.2, “Health, safety and security of employees, temporary staff and subcontractors”, pages 177 to 180).

VINCI employs the following strategies to embed its culture of safety for all into every level of the Group.



4.2.1 A Group framework driven by managers and a health and safety network

- **One reference framework for all**

The joint declaration signed by the Chairman and Chief Executive Officer of VINCI and by the Secretary of the European Works Council, “Essential and Fundamental Actions Concerning Occupational Health and Safety”, provides the Group’s reference framework. It is available in 22 languages and published on VINCI’s website (<https://www.vinci.com/publi/manifeste/sst-2017-06-en.pdf>). Steady, constructive social dialogue informed this declaration, which is part of VINCI’s continuous efforts to engage all employees in a shared safety culture. It is also intended to help the Group’s partners reach their own safety improvement goals.

In operational terms, the declaration states that a risk assessment must be carried out in advance of every work situation, including unplanned situations, and that appropriate preventive measures arising from the assessment must be incorporated into operating procedures and processes. In addition to collective protective measures, entities must provide workers with personal protective equipment suited to each work situation and ensure that every worker fully understands the risks associated with their activity and the measures to be followed to reduce them. Employee representatives are kept informed of action taken to prevent workplace accidents and occupational hazards and contribute their own proposals. Occupational health and safety awareness and training programmes are essential to ensuring that all workers understand the risks. Employees must be trained during their work hours and be given clear instructions and explanations relating directly to their job or task.

Since real and sustainable improvement cannot be achieved without measuring outcomes, VINCI assesses the effectiveness of its action using relevant indicators, which are presented and discussed to determine what steps can be taken to further improve results. Companies methodically and thoroughly investigate every accident and share the findings with employee representatives. Efforts to identify hazardous situations and near misses aim not only to reduce the number of accidents but above all to embed the safety culture into everyone’s daily work.

These foundational rules apply to everyone, at every operating site or worksite at which VINCI companies oversee operations, and across all businesses, all companies and all countries where the Group operates. In compliance with the global framework, each business line adapts and implements its health and safety policy to closely address local challenges.

- **Manager accountability and a large support network of health and safety specialists**

VINCI’s managers bear the primary responsibility for instilling and promoting the Group’s safety culture. This responsibility is shared among the different levels of management in its business lines, divisions and companies. Dedicated occupational health and safety departments and a worldwide network of more than 2,500 employees in health and safety roles support managers in spreading the safety culture. They work together to implement an occupational risk prevention management system that complies with VINCI’s requirements and reflects the realities of their entity or project.

At Group level, health and safety policy is supervised by the Health and Safety Coordination unit, under the authority of the VINCI Executive Committee. The Coordination unit is chaired by a member of the Executive Committee and made up of the health and safety directors of the Group’s business lines and divisions. Its mission is to build a common safety culture, mainly by facilitating the sharing of best practices and feedback among business lines, assessing existing procedures, delivering reliable indicators and initiating improvements. It meets regularly with the Executive Committee to debrief and discuss accidents and significant events. The Health and Safety Coordination unit also works together to assess the sector’s human resources needs and promote mobility. It also launches foresight approaches to address emerging business risks and takes action to develop innovation in health and safety.

Business lines and divisions structure their activities to enable the development of a common language and tools, which they use to monitor actions and results; reliably collect feedback, share information and issue alerts; and analyse trends in their business activities so they can enhance their risk prevention. Each business line or division has a coordinating body to help cascade information throughout the organisation. For example, the health and safety directors of VINCI Autoroutes and VINCI Energies hold a coordination meeting every quarter. At VINCI Construction, the coordination team meets monthly. The head office of VINCI Concessions produces a monthly report of health and safety data from all entities, including those that are not fully consolidated and their subcontractors. The international network of health and safety experts ensures that the safety culture spreads across borders, sharing best practices developed in various countries and ensuring that rules and tools are understood and applied by all. The health and safety departments at the head offices of business lines and divisions facilitate safety audits across their organisation and help to integrate new companies.

4.2.2 Major risk identification and assessment

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 so that it can take preventive measures that are best suited to its business activities and local context.

A health and safety risk analysis is conducted ahead of any work situation. It takes into account the work environment, the characteristics of the project under consideration and its specific technical requirements. These multiple layers of analysis are needed to develop a response that is tailored to the operational issues of each project, business activity and country.

The Institute for an Industrial Safety Culture (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 that the Group's activities have in common and to assess the tools used to manage these risks. The Health and Safety Coordination unit reviews this risk map every year.

The risk mapping identified six major risk categories and their associated types of potentially major events. A major risk is defined as the actual or potential 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.

Major risk categories	Types of potentially major event
Risks relating to moving objects	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 structure
	Crushing from the fall of a suspended load
Risks relating to working at height	Falling from heights
Risks relating to energised or pressure equipment	Electrocution
	Projection of high-pressure fluids
Risks relating to handheld mechanical tools	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

4.2.3 Policies tailored to the activities of business lines and divisions

In response to identified risks, business lines and divisions develop their own risk prevention policies. These establish a set of guidelines to be applied by all operations 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, producing a response that is tailored to the on-the-ground realities of each sector, activity or operational context. They form the framework that determines the preventive actions to be incorporated into operating procedures, work instructions and the organisation of work. All business lines apply special scrutiny to major risks. These guidelines and the resulting actions taken are part of a continuous improvement effort and are regularly reviewed, especially in response to health and safety audit results, employee surveys and feedback and analysis of accidents and near misses.

In 2021, VINCI Concessions published a safety handbook that describes the five pillars of its safety culture. These mainly focus on understanding and integrating the Group's requirements; ensuring manager training, involvement and evaluation; carrying out in-depth analyses of risks and accidents and sharing and communicating the results; and spreading the safety culture in every country by engaging employees, their representatives and outside companies. This document was made available in 12 languages and shared with all companies. These entities are responsible for applying the guidelines and developing an action plan tailored to their situation. Subcontractors participating in the construction and operating phases are included in the health and safety management system.

VINCI Energies supports the view that a strong safety culture must be embedded in the everyday practices of each individual. It promoted the six pillars of its safety culture during Safety Week. The pillars are the common areas on which all companies must collectively focus for a stronger safety culture: exemplary leadership, transparency, sharing of lessons learned, commitment, risk awareness and understanding of procedures.

In 2021, VINCI Construction fully revised its health and safety policy, as a consequence of the business line's recent reorganisation. It created working groups to share best practices and innovations from both of the now merged business lines and to enhance and strengthen the shared safety culture. The culture's three core values were quickly identified: transparency, exemplary conduct and dialogue. The business line continues to apply existing guidelines, such as the "Building in safety" methodology, which provides a framework for managing risks at each of a project's key stages. It incorporates safety concerns into work instructions and procedures early on, beginning at the design stage. During the work execution phase, the works manager holds a pre-start briefing with the site team prior to starting a new job 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 to be followed by all workers to prevent major risks. Many other country-specific and business-specific guidelines are applied to improve the management of major risks. Based on the results of a survey on health and safety climate perceptions, to which more than 33,000 employees responded, VINCI Construction held workshops to discuss the findings. Many of its entities apply a root cause analysis process after an accident or near miss.

Business lines also develop their own 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 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. Implementation of the plan continued in 2021, with encouraging initial results. VINCI Autoroutes worked to improve motorway intervention procedures, in collaboration with French government agencies, and to evolve equipment, such as by developing an AI-powered intrusion and collision detection system. To protect the “men and women in yellow”, communicating to motorway users and personnel is as essential as ever. This year saw the launch of a new awareness and action campaign in social networks and other media, called #Exposed. Damaged patrol vehicles were displayed at various motorway rest areas to expose to public view the consequences of collisions mainly caused by fatigued or distracted drivers.

4.2.4 Actions taken to foster a safety culture shared by all

- **Dialogue with employees and their representatives**

In the policies implemented by business lines and divisions, the participation of employees and employee representatives is central to building a safety culture, as emphasised in the Group’s joint declaration. Consulting employees and keeping them informed are critical factors in their level of uptake and engagement across the organisation.

Business lines and divisions regularly meet with employee representative bodies to present initiatives in progress and report on outcomes. As a result of this social dialogue, specific agreements have also been negotiated and entered into with trade unions. In 2021, 25 health, safety and prevention agreements were signed by Group companies (33 in 2020). Following recommendations made by the Group Works Council, VINCI companies in France with over 50 employees are encouraged to set up a health, safety, and working conditions committee (CSSCT), thus going beyond legal obligations. Furthermore, companies of any size are advised to hold a regular economic and social committee meeting every month, and to check the organisation’s progress on prevention, health and safety indicators at every meeting. Outside of France, some divisions and companies have formed health and safety committees whose members include employee representatives, even if the law does not require it. VINCI looks to these committees to provide local insight and enhance risk prevention at its worksites and operating sites by suggesting areas for improvement, monitoring measures and assessing the need for any adjustments.

1,577

meetings of health, safety and working conditions committees across the Group in 2021

Various Group entities also offer training to employee representatives to boost their participation and help them carry out their duties regarding health, safety and working conditions. The training is delivered by VINCI’s health and safety specialists, by trade union representatives or by professional organisations such as the French Professional Agency for Risk Prevention in Building and Civil Engineering (OPPBTP).

Health and safety is a core component of all social dialogue between the Group and the Group Works Council or the European Works Council. In 2021, as part of its continuous dialogue with Building and Wood Workers’ International (BWI), VINCI signed the latter’s “Declaration on Healthy and Safe Workplaces” in support of the recognition of occupational health and safety as a fundamental right by the International Labour Organisation (ILO).

Dialogue is also maintained through employee surveys. VINCI Construction has made the decision to investigate employee perceptions of the safety climate at least every two years. These surveys are administered at division and company level to capture the on-the-ground realities of operating sites and worksites. Subcontractors and temporary workers are encouraged to participate. In 2021, VINCI Construction France surveyed perceptions of its safety communication. The study, which is being finalised, used a sample of nearly 650 employees, including managers and site teams, representing the different business activities and regions. Soletanche Freyssinet also conducted a survey of its entire workforce of 22,000 a month before International Safety Day in 2021. The questionnaire was anonymous to encourage respondents to answer freely. Half of the items applied to the division, and the other half applied to the local company. In addition to getting direct feedback from site teams at worksites, it aimed to give local managers a sense of their workers’ perceptions. The response rate was high and, on International Safety Day, the results were shared locally to encourage group discussion on how to drive improvement in each company and in the division.

- **Engaging employees in everyday prevention through alert mechanisms and the processing of reports**

The joint declaration 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. Employees are strongly encouraged by managers 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 MoveSafe was launched in May 2019 for all VINCI Autoroutes companies. It enables any employee to electronically report any information about a dangerous situation or near miss. Employees have made more than 3,500 reports, together helping to raising safety levels in the company. 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 18,500 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. It is the most frequently downloaded application for use “in the field” at VINCI Energies.

At VINCI Construction, applications like Watch and Notify make it easy for any employee to report a hazardous situation or a best practice observed at a worksite using their smartphone. These apps are interfaced with internal incident management and reporting systems, which ensures the traceability, reliability and dissemination of the information. They make life easier for users and enable companies to implement appropriate measures to reduce their 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.

Discussion sessions with employees are regularly held to obtain their input on accident analysis and the measures that should be introduced, and also to keep them informed of accident investigations and the corrective action that was taken to prevent similar situations from happening again. Suggestion boxes are frequently set up at worksites and in companies to encourage all workers to speak up freely, regardless of their employment status, report any difficulties encountered and propose their own ideas.

- **Continuous on-the-ground training of employees**

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 involve employees, temporary workers and subcontractors. These initiatives are coordinated by HSE officers with visible support and commitment from the managers of the worksite or operating site. 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 a core component of training, to continuously improve its effectiveness and adapt it to changing activities. For example, some businesses use virtual reality simulation training. 4D visualisation has also been employed to re-enact accidents and potentially serious incidents and better analyse the root causes, followed by feedback sessions with workers, managers and outside staff to share the lessons learned from the experience. VINCI Construction developed Alive on Site, a tool used to film employees, with their consent, as they perform a job and view the images later with the team in charge to detect risky behaviours and best practices. This session is facilitated by a safety instructor, most often from outside the worksite, to encourage open sharing and discussion. The aim of these on-the-ground analyses is to encourage participants to share their points of view and heighten their awareness of risks, both individually and as a group. Special attention is paid to the training of new employees and lesser skilled workers, for whom accident rates are often higher.

37%

of training hours in 2021 devoted to health and safety, totalling more than 1.5 million hours

In addition to daily on-site training of employees, the Group continues to make online content available at any time, via its e-learning platform Up!. In 2021, employees had access to more than 650 training resources in health and safety (490 in 2020), which accounts for 7% 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, specifically to incorporate safety issues into occupational training.

- **Manager involvement and accountability**

Managers and executives undergo dedicated training to reinforce the safety culture in leadership and foster leadership accountability for health and safety performance. Worksite visits by managers are a well-established practice; all companies across the Group arrange these on a regular basis. Health and safety are an agenda item of management committee meetings at every business line, division and company. Managers’ performance is increasingly assessed against criteria linked to the results of health and safety measures and their demonstrated involvement in promoting prevention initiatives.

For example, at VINCI Construction, the “Managing Safety” programme promotes five essential actions, the first of which is to assess managers’ safety culture prior to their annual performance review. The programme addresses the organisational and human factors in accident prevention. It aims to help entity managers to develop a just culture and to better prevent accidents by understanding their root causes. At VINCI Concessions, training for managers is the second of the five pillars of its safety culture. All managers must be trained in prevention basics to ensure that they incorporate these rules into the organisation of work. A new e-learning module for managers will be launched in 2022. Managers are also expected to proactively manage health and safety through actions ranging from carrying out safety inspections to interviewing injured workers and responding to surveys. At VINCI Energies, a new “Safety Excellence” course was added to the VINCI Energies Academy catalogue of basic training. Many other courses – such as those for operational directors, business unit managers, project directors, project managers and worksite managers – were updated to incorporate the core “Safety Excellence” messages.

- **Safety incentives for employees**

Safety incentives, rewarding employees for achieving safety goals, are implemented at the Group's highest level of leadership. For example, the short-term variable remuneration of VINCI's Chairman and Chief Executive Officer is linked to environmental, social and governance (ESG) criteria, which include health and safety indicators. The Board of Directors' Remuneration Committee defines and assesses these criteria.

Likewise, the long-term variable remuneration paid to a large number of Group managers is based in part on improvements to workplace safety performance. Safety criteria also determine the short-term variable component of the remuneration of many managers and, frequently, the performance bonuses awarded to production workers up to the operator level.

Most collective profit-sharing agreements signed by the Group are based on operational as well as financial performance and include criteria such as improvement of workplace safety indicators.

- **Health and safety events to drive employee engagement**

Dedicated health and safety events organised in each business line and division are an important driver of engagement among employees and partners. These events enable managers to demonstrate their commitment to safety, visibly and to all employees, and help embed the safety culture across the organisation. Temporary workers, subcontractors and customers all participate in the conferences, workshops, training sessions, simulation exercises and other activities rolled out for each event. Each year, VINCI Energies organises Safety Week, a flagship event celebrated by every entity, worksite and operating site, in addition to many other awareness, training and risk prevention initiatives also rolled out locally. Safety Week is an opportunity for all teams to focus on their safety commitments and suggest ways to improve their company's safety performance, which will shape a shared strategic plan.

In May 2021, the global workforce of VINCI Construction companies – a total of over 115,000 people – took part in Safety Days, with each division holding events to promote the three core values of dialogue, exemplary conduct and transparency. In October 2021, VINCI Concessions chose "Stay alert, be aware and take action to keep safe" as the theme for its International Safety Week. All 90 operating entities in 25 countries, including head offices, held health and safety events, in which more than 30,000 employees and partners participated.

Also in 2021, VINCI Autoroutes held its fifth Prevention Challenge contest, expanding it to include all of the business line's departments and head offices. To raise the visibility of initiatives and enable voting by all employees, a video presentation of each project was posted online. Project teams had to demonstrate employee engagement and how their project supports the 2020-2022 health and prevention policy. The various projects addressed managing prevention, training, worksite and operating site safety and targeted employees of VINCI as well as those of external companies. In addition to being a key reminder of the importance of proactive health and safety management, the competition highlights the need to continuously innovate to instil a safety culture shared by all.

In addition to the actions taken by business lines, many VINCI subsidiaries also organise in-house events and competitions to reward health and safety initiatives and increase their visibility.

- **Managing and preventing risks for employees of subcontractors and temporary employment agencies**

VINCI's Subcontractor Relations Guidelines (<https://www.vinci.com/publi/manifeste/cst-en.pdf>) underscore the Group's commitment to ensuring the same level of security for its own employees and those of its subcontractors.

The established procedures at a construction or operating site make no distinction between employees of Group companies and temporary workers or subcontractors. Health and safety requirements are stated in advance, included in specific contract clauses and verified by Group companies. They range from the wearing of suitable personal protective equipment to reporting accidents or any other continuous reporting obligation regarding on-site hazards. Specific criteria may be applied as of the selection phase and lead to the subcontractor being disqualified. Health and safety teams analyse accidents, especially serious or potentially serious accidents, and use their findings to update action plans and create a safer environment for outside workers. All staff are included in the safety audits conducted at sites. The health and safety coordination unit may hold meetings to assess subcontractor compliance with contractual obligations. As a general rule, workers employed by subcontractors or through temporary employment agencies not only attend global events and on-site training, but also take part in discussion workshops on improving prevention at construction and operating sites. In many cases, indicators for divisions and companies do not distinguish between permanent staff and temporary workers, and they increasingly include subcontractors. Efforts to improve prevention among temporary workers and subcontractors go beyond verifying compliance. The Group also takes steps to help its partners elevate their safety standards and implement more effective actions, especially in countries where the safety culture is not as strong.

In 2012, VINCI Autoroutes launched its "Zero Accident Programme Management" campaign after a string of serious incidents occurred at worksites. This policy aims to improve safety for all construction site workers, from the design phase to completion, based on three pillars: one, reinforcing contractual safety obligations in works contracts; two, increasing the on-site presence of programme managers (participation in pre-start meetings, internal and external site audits, training and awareness events, awards presented to the most engaged companies, etc.); and, three, ensuring that VINCI Autoroutes support teams share their feedback and experience from safety incidents with operational workers. Since the policy was implemented, the number of lost-time workplace accidents has been reduced by two-thirds. In 2021, as the policy's 10th anniversary approached, each regional department invited outside experts to a day of workshops on the commonest hazardous situations and exchanging virtuous practices. More events will be held in 2022 to celebrate the policy's 10 years of existence and chart its evolution for the next decade.

VINCI has implemented a framework agreement for use in the approval process for temporary employment agencies, incorporating health and safety criteria. For example, agencies must disclose their health and safety data and demonstrate an established safety culture, such as a safety training program for workers. It is compulsory for Group entities to use approved agencies to recruit their temporary workers. Agency-specific action plans have been developed as needed, on a case-by-case basis, and include measures to better protect the safety of temporary workers. These include worker surveys, reporting on the outcomes of prevention initiatives, company-led awareness and training events and improved recording of workers' safety documents (such as the Carte BTP – a professional identification card for construction site workers). In France, temporary workers who successfully complete a two-day safety training session and assessment can obtain a safety passport called Pasi. The passport demonstrates acquisition of the safety fundamentals that every worker must understand before starting work on a construction site. 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.

23%

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

4.2.5 Assessing the situation of subsidiaries, subcontractors and suppliers

Safety audits carried out by VINCI's network of health and safety specialists are foundational to its health and safety policy. These experts, along with the health and safety departments of business lines and divisions, plan and conduct safety audits at operating sites and worksites controlled by Group companies. They also share and analyse results, monitor trends and tailor the actions taken to their operations. Business lines and divisions use common tools to facilitate the reporting, consolidating and sharing of information, especially audit results. The Group is also expanding cross auditing among its various companies. Since the established procedures at a construction or operating site make no distinction between employees of Group companies, subcontractors and temporary workers, audits apply to the entire site and all staff at the site. In addition to the business line and division level, risk management systems are also in place at project and site level to ensure that those measures relating to health and safety are effectively applied. Any nonconformity is followed up until it is corrected.

As an example of these audit systems in business lines and divisions, VINCI Construction Grands Projets has a dedicated audit unit 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. VINCI Construction Grands Projets' head office audits each project every two years, to ensure that its management system fully complies with safety requirements. These requirements reflect applicable standards (such as ISO 9001, ISO 14001 and ISO 45001), guidelines applied by VINCI, VINCI Construction and VINCI Construction Grands Projets' head office, as well as a project's specific contractual requirements (as defined by the safety plan, environment plan, quality plan, process map, requirements of partners and other interested parties, laws and regulations in force, local standards, etc.). ISO 9001, which is a core standard for audits, also covers all aspects relating to the management, selection, monitoring and assessment of subcontractors. 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 unit 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 updates on progress, supporting documentation and trends are also provided. In 2021, 22 audits were conducted, compared with 16 the previous year.

As well as these internal audit systems, audit procedures relating to health and safety at Group entities may also involve obtaining certifications, creating a need for external audits. Every regional division and the head office of VINCI Construction France is ISO 45001 certified (Occupational Health and Safety Management System). The three VINCI Autoroutes concession companies with operations activities are also all ISO 45001 certified. Following Cofiroute's certification in April 2019, ASF and Escota completed the certification process in 2021. The audits required to maintain certification provide opportunities to periodically assess the quality and maturity of various aspects and to identify strengths, opportunities for improvement and any nonconformities. The aspects covered include company policy, leadership and management engagement, employee participation, training and awareness, work preparation and organisation; management of materials, equipment and products, risk prevention for external companies, regulatory compliance and accident management. These audits are followed internally by operational reviews in regions and a central management review, at which times corrective actions are determined and new objectives set.

Health and safety audit procedures in VINCI business lines

- A health and safety policy, system, internal audit schedule and dedicated department for every VINCI business line
- Close involvement of company managers in audit outcomes and improvement actions to be taken
- 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
- Inclusion of all site personnel (VINCI employees, temporary workers, subcontractors, etc.) in safety audits on worksites and sites under operation
- Expansion of cross auditing among companies
- Continuous certification process under way in the Group (ISO 45001, MASE, etc.)
 - VINCI Construction: 85% of revenue certified ISO 45001 and 13% of revenue certified MASE
 - Eurovia: 53% of revenue from the works activity certified ISO 45001
 - VINCI Energies: 36% of revenue certified ISO 45001, 7% of revenue certified MASE and 15% certified LSC, VCA or SCC
 - VINCI Autoroutes: 100% of in-service motorways certified ISO 45001
 - VINCI Concessions: 51% of revenue certified ISO 45001

4.2.6 Monitoring the effectiveness of measures put in place

• Reporting and analysis of accidents and potentially serious incidents

VINCI's business activities expose employees and other workers at its worksites and operating sites to risks with potentially serious consequences. All Group companies must have a system in place to report accidents and potentially serious incidents. Every accident must be recorded and analysed; appropriate action must be taken and monitored. If an accident occurs, an investigation into the root causes is carried out. Organisational factors, such as procedures and equipment, and human factors are examined using proven tools and methodologies. Health and safety specialists and managers alike regularly receive specific training on how to effectively investigate incidents. The results of the investigations are reported and discussed at every management level, from the company to the division or business line, in the presence of health and safety directors. Based on the results, changes may be made to work procedures, materials and equipment, which are then communicated to all employees and people working at the site, using dedicated online and on-site resources, as well as during in-person meetings so that staff can dialogue and interact.

At their own level, the business lines and divisions develop accident reporting tools and applications to facilitate the sharing and spread of best practices across business lines and divisions, especially relating to the analysis of accidents, near misses and potentially serious incidents with regard to major risks. The health and safety departments of business lines and divisions consolidate reported information according to precise rules, enabling them to detect and analyse trends. This insight informs actions to prevent a serious accident from happening in similar circumstances. These tools are regularly fine-tuned, to enhance experience-sharing when recurring risks are observed at several entities, to develop action plans at the right level of the organisation, to increase actions and campaigns to prevent a specific risk and to reassess, as needed, risks identified as major. For example, VINCI Concessions rolled out an application for sharing analyses of accidents or near misses in a fact sheet format that any entity can view, enabling companies to learn from the similar experiences of others. Emphasis is placed on potentially serious incidents. The bilingual app attracted more than 1,000 unique visitors in one year.

• Monitoring and alert procedure for fatal accidents

Every fatal accident is immediately notified to VINCI's Executive Management and thoroughly and methodically investigated. All the involved parties participate in an in-depth analysis and a full report is made to VINCI's Chairman and Chief Executive Officer, 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. Its purpose 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.

• Assessments shared with the Group's executive leadership

The management committees of the Group's business lines and divisions are kept informed of reports of serious accidents and potentially serious incidents. More generally, health and safety performance is measured and tracked using relevant indicators, which are presented to the management committees of business lines and divisions, to enable improvement actions to be discussed and leadership engagement to be renewed. At VINCI Autoroutes, the management committee examines key indicators every two weeks. Furthermore, management reviews are held annually to analyse results obtained and set new goals for the future. At VINCI Concessions, the safety policy is championed by a Safety Committee, which meets twice a year and is chaired by the CEO. At these meetings, the committee assesses the progress made and the achievement of action plans. At VINCI Construction, every meeting of managers opens with a safety update; likewise, at the start of every Executive Committee meeting, members review significant events and monthly results. At VINCI Energies, prevention and the safety culture form an integral part of the Executive Committee's responsibilities. The Executive Committee and the management committees review detailed analyses of major accidents and other potentially serious incidents to better learn from them and prevent them from happening again.

Presentations are also 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 entire Board of Directors.

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.

Main performance indicators in 2021

- Lost-time workplace accident frequency rate, worldwide:
 - VINCI employees ^(*): 5.74 in 2021 (5.32 in 2020 and 6.84 in 2016)
 - Temporary staff: 13.54 in 2021 (14.09 in 2020 and 10.54 in 2016)
- Workplace accident severity rate (VINCI employees) ^(*): 0.42 in 2021 (0.43 in 2020 and 0.47 in 2016)
- Percentage of Group companies with no lost-time workplace accidents: 73% in 2021 (75% in 2020 and 70% in 2016)

Definitions

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

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

4.3 Duty of vigilance with regard to human rights

VINCI has made public commitments to respect, protect and promote the rights of people and local communities that may be impacted by its projects and activities. The Group continuously 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.

4.3.1 Major risk identification and analysis

A Human Rights Steering Committee, comprised of the human resources directors of all business lines and divisions, was set up at the end of 2015 to undertake the extensive work required to identify the Group's major risks. Employee consultations and discussion forums were held, at which representatives of organisations or companies outside the Group sometimes participated to share their experience. The steering committee also took into account international standards, specialist research, guidelines and previous work produced by the Group (such as its handbook on fundamental social rights or standards for workers' accommodation).

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

This analysis of risks and issues was also informed by the human rights impact assessment commissioned by VINCI in Qatar and carried out by an independent third party, Business for Social Responsibility (BSR), in 2015. The methodology used for the impact assessment was to identify, in the different sets of codified rights, those issues that were salient to the Group's activities. Interviews were held with key VINCI stakeholders, such as the Building and Wood Workers' International (BWI), the International Labour Organisation (ILO), the International Organisation for Migration (IOM), the French National Consultative Commission on Human Rights (CNCDDH), the Danish Institute for Human Rights, and non-governmental organisations having worked on human rights issues in that region (Amnesty International, Human Rights Watch, Engineers Against Poverty, Business & Human Rights Resource Centre, etc.).

In the summer of 2016, the Human Rights Steering Committee validated 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 workers, local residents and local communities. Since their publication, the relevance of the salient issues identified has been confirmed by various Group entities and validated by feedback from operational teams in different countries. Likewise, dialogue with members of the European Works Council has not led to any change in the risk map to date.

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. 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.	4. Wage levels 5. Working hours 6. Paid holidays and other benefits 7. Workers representation 8. Hiring underage workers 9. Discrimination 10. Occupational 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 and must work in close collaboration to identify, avoid or mitigate them (for example, impacts on the daily lives and livelihoods of nearby residents).	15. Socio-environmental issues 16. Land-related issues 17. Community dialogue, engagement, and grievance mechanisms

4.3.2 Tailored guidelines applied across the Group and supported by a dedicated governance structure

Based on this risk map, VINCI developed VINCI's Guide on Human Rights (www.vinci.com/vinci.nsf/en/item/guide-on-Human-rights.htm), which forms the backbone of its work in this area. It presents guidelines to be followed by the Group's entities, all businesses and countries combined, for each issue and theme. These guidelines 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 operating phases. They were designed to be adapted to the on-the-ground reality of each sector and activity, so that entities can anticipate risk factors as early as possible and design practical responses to prevent human rights risks. 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.

This framework document, published on the VINCI website, was validated by the Group's Executive Committee in April 2017, after consulting with the European Works Council, which approved the policy. The implementation of human rights policy is presented annually to the Board of Directors' Strategy and CSR Committee and discussed with the European Works Council.

It has been broadly disseminated to employees and presented to every management committee in the Group's business lines and divisions, and continuous efforts are made to build awareness. VINCI's internal control survey for 2021 showed that by the end of September, 95% of the entities surveyed, all business lines and divisions combined, had communicated about the Guide to their employees, a 2-point improvement over the previous year. An action plan is being developed for the remaining entities. To facilitate the adoption and dissemination of the guidelines, the guide was translated into 23 languages, thereby covering more than 98% of the Group's workforce, based on the official languages of the countries where the Group operates.

95%
of entities in VINCI's
internal control survey have
disseminated VINCI's Guide
on Human Rights

The Group's Human Resources Director, who is a member of the VINCI Executive Committee, pilots human rights policy with the support of the Group's top management and the Human Rights Steering Committee, which was maintained after completion of the guide. As VINCI's management is highly decentralised, the steering committee facilitates 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 (CSR) Department, reporting to the Human Resources Department. The CSR Department shares its expertise with business lines and divisions to help them incorporate and implement Group measures, develop risk-mapping and assessment tools, evaluate subsidiaries, train and build awareness among employees and management committee members and communicate with Purchasing, Internal Control, Ethics and Vigilance, Security, Health and Safety Coordination and other departments. The team is in frequent contact with interested external parties to address identified issues, answer questions and provide further information about the measures taken in the Group.

4.3.3 Preventing serious human rights infringements in the Group

- **Guidelines incorporated into internal processes and operating procedures**

Business units and divisions gradually incorporate guidelines into their internal rules and procedures. For example, in internal procedures manuals for key processes, such as recruitment, VINCI Construction Grands Projets has included issues that should alert users to potential human rights risks. Along with other Group divisions, it has also reviewed and validated its internal standards for living conditions, which are based on the Group's guidelines but adapted to the division's business activities. In addition, VINCI Construction Grands Projets significantly expanded the human rights component of its tendering guide to help the teams preparing responses to calls for tenders to better understand and manage risks early in the process.

VINCI's guidelines are also directly incorporated into processes and procedures at the company and project levels. 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. In this context, the Group provides a key means of support by facilitating audits of human rights risk management in subsidiaries and projects. Such audits are opportunities to perform joint assessments, take into account the operating environment and identify any areas for improvement (see paragraph 4.3.4, "Assessing the situation of subsidiaries, subcontractors and suppliers", page 245).

- **Addressing and prioritising issues at the country level**

An understanding of the local context is essential to determining which issues are most relevant and conducting appropriate preventive actions. For this reason, VINCI also maps risks for individual countries, enabling the various issues and themes to be more accurately analysed for a given context and prioritised accordingly. These country risk maps are informed by reports published by public administrations, international organisations, non-governmental organisations, academics, trade unions, the media, and so on, and include insight into the country's legal and institutional frameworks. As a result, they provide a more granular picture of the risks inherent to each country and business sector and are a foundational resource for assessing a subsidiary's situation. They are also essential tools for making the Group's employees and partners aware of the risks in their operations, contractual arrangements and partnerships that require special scrutiny. Country risk maps are updated to reflect dialogue with employees and feedback from teams on the ground.

Country-specific analysis of human rights risks

- 24 country-specific human rights risk maps, developed with the support of an external provider, available in 2021
- 17 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 91% of the workforce in countries identified by the Group as high-priority^(*) with respect to these human rights risk assessments.

^(*) The 2021 action plan is based on data at 31 December 2020.

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

VINCI considers that in matters of human rights, leaders play a decisive role. The Group places emphasis on awareness and training initiatives for managers and employees. It aims to foster a culture of human rights risk prevention, as it has done in the area of safety, and provide tools to help operational teams take preventive action as early as possible.

In 2019, after a year of collaborative in-house development, VINCI launched an e-learning course to raise awareness of human rights risks. It is currently available in five languages: English, French, Polish, Portuguese and Spanish. Although open to all entities and employees, the course primarily addresses managers and those in charge of human resources, administration, finance, and health and safety. Completion is monitored and reported to the Human Rights Steering Committee. At the end of 2021, more than 4,000 employees in the target groups, in nearly 70 different countries, had finished the course. A complementary course for managers of concessions was developed in 2021. It delivers an interactive presentation of the issues that may arise during a project's three phases: development, design-construction and operating-maintenance. In addition, several of the Group's well-established, emblematic training programmes now include a human rights component. One example is Team Grands Projets, a training course implemented across the construction and energy businesses to build the skills of managers of major projects and help them handle complex environments more effectively.

- **Alert mechanisms for raising concerns**

The Group also upholds its commitments by providing multiple channels by which employees can report concerns. Grievance procedures include contacting human resources departments, health and safety representatives, line managers 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 4.5, “The Group’s system for whistleblowing, alerts and the processing of reports”, page 258), in light of VINCI’s multi-local organisation and the nature of its activities, the implementation of local grievance 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 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. The alternative alert mechanisms include a dedicated email address, hotline or digital solution. Some companies, such as LISEA in France and Lima Expressa 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 Lima Expressa.

Although VINCI entities are sometimes the customers, 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.

4.3.4 Assessing the situation of subsidiaries, subcontractors and suppliers

- **A tool to assess subsidiary practices**

The Group has developed a tool to assess practices, based on its five salient issues and 17 themes. It consists of a series of precise questions on each theme to evaluate whether the management systems in place conform to the Group’s guidelines and whether they specifically address and prevent the risks identified in a given country, in the subsidiary’s own operations and in its relations with subcontractors and temporary employment agencies. Based on the 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, major risks are monitored and assessed at Group level. These assessments are generally conducted by the CSR Department and by specifically trained staff in business lines and divisions. They may entail additional interviews with employees of the subsidiary, subcontractors or service providers working on the site.

In 2020, the assessment tool was updated to reflect user experience and critical feedback from several corporate and human rights experts, and in 2021 the CSR Department developed a digital platform to make it available to all Group employees.

- **Risk analysis in the tendering phase or prior to acquiring new companies**

VINCI’s Internal Audit department has begun updating the risk scorecards used by risk committees to assess projects. Consideration of non-financial risks, in addition to technical and financial risks, has been reinforced. Human rights risks include risks relating to recruitment practices, accommodation and impacts on local communities and nearby residents. Prior to new acquisitions, a human rights risk assessment must be conducted and examine such aspects as the country of operation, the company’s commitments and the resources devoted to preventing human rights risks.

- **Assessing the situation of subcontractors and suppliers**

In VINCI’s businesses, whether in construction, energy or concessions activities, the major challenges are at the operational level. Accordingly, when it comes to vigilance with regard to human rights risks in the value chain, priority is given to subcontractors and temporary workers employed at worksites and sites under operation.

The Group has provided all entities with a due diligence methodology that includes the following steps: mapping human rights risks for subcontractors and service providers, applying specific criteria during the selection phase, including specific clauses in contracts and monitoring compliance with contractual obligations. Other verifications and audits are carried out on a case-by-case basis. To help business lines and divisions implement the methodology, the Group has run pilot projects on preventing social risks in subcontracting (see page 249, “Preventing social risks in subcontracting in France”).

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 4.2, “Duty of vigilance with regard to health and safety”, page 234). During the latest agency selection process, 23% of those assessed were excluded based on ESG criteria. Beyond the selection phase, Group companies also put controls in place while contracts with agencies are ongoing to prevent risks of infringing 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 to which they are entitled. These items are also verified during subsidiary 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 are conducted with the Group’s Purchasing Coordination unit. The purchasing category is analysed in depth and the associated social risks are mapped. Invitations to tender and specifications integrate social criteria, based on identified issues. Depending on how they perform against the criteria, some suppliers may be discarded, while for others, a CSR improvement plan may be proposed, with the aim to promote collective upskilling (see also paragraph 2.2, “Relations with suppliers and subcontractors”, page 197).

4.3.5 Building leverage through active collaborations

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 necessary leverage 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 coalitions and initiatives, working in collaboration with a variety of stakeholders on tools, methodologies and actions that promote human rights, to better address human rights issues.

Main collaborative initiatives in which VINCI participates

- **Building Responsibly** (<http://www.building-responsibly.org>), of which VINCI is a founding member and a co-chair in 2021-2022. Building Responsibly brings together engineering and construction firms in order to develop common approaches, standards, and tools, share best practices 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. This initiative aims to inspire the entire construction ecosystem to commit to promoting workers' rights. In the medium term, it seeks to have its worker welfare principles recognized as standards by all industry players.
- **Leadership Group for Responsible Recruitment** (<http://www.ihrb.org/employerpays/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.
- **Entreprises pour les Droits de l'Homme / Businesses for Human Rights (EDH, www.e-dh.org/home.php)**, of which VINCI is an executive board member. This association of 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.
- **UN Global Compact** (<https://www.unglobalcompact.org>), which VINCI signed in 2003. VINCI is a member of the Human Rights Club of the French network of the Global Compact.

4.3.6 Monitoring implementation and effectiveness

Through its CSR Department, the Group monitors and reports on policy implementation in its operations and conducts audits as required. Outcomes are presented to the Group's top management, the Board of Directors and the European Works Council.

• Third-party audits of subsidiaries

In some cases, the Group arranges for independent audits or other external controls of the management of major risks.

This is the case in Qatar, where a framework agreement ([https://www.vinci.com/commun/communiqués.nsf/04438CA8C4A62422C12581DF00384D96/\\$file/Accord-cadre-En.pdf](https://www.vinci.com/commun/communiqués.nsf/04438CA8C4A62422C12581DF00384D96/$file/Accord-cadre-En.pdf)) was signed by VINCI, its subsidiary Qatari Diar VINCI Construction (QDVC), and Building and Wood Workers' International (BWI). It provides for a 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. A new audit of the implementation of the agreement took place in October 2021 with all parties present. As in 2019, VINCI's trade union representatives were invited to participate. The audit covered all items in the agreement. A joint audit report will be published in early 2022.

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 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. The Group continues to monitor the situation alongside its subsidiary and the NCP.

In addition, especially for major projects, the Group employs independent service providers to assist teams in assessing human rights risks and designing measures to mitigate impacts.

• Integration of human rights into the Group's internal controls

VINCI's internal control system has been expanding its focus to increasingly include human rights. 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. The audits led by VINCI's internal control team may include customised questions relating to human rights issues, developed in collaboration with the CSR Department.

VINCI added a section on preventing human rights risks to its annual internal control survey four years ago. The 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. 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 and shared with the Group's business lines and divisions. The Group also uses the survey results to shape its future initiatives.

• Monitoring implementation, especially in priority countries

The order of priority for subsidiary audits, conducted by the CSR Department and evaluators in business lines and divisions, is determined based on a consolidation of eight internationally recognised indicators^(*) and the strength of the presence (workforce and revenue) of VINCI's companies in a given country. Priority is given to assessing subsidiaries in countries where the Group's presence is strong and human rights are deemed to be at risk. Because some VINCI company activities are project-based, this ranking and the accompanying road map are reviewed each year to account for changes in their geographical locations, level of activity, and external indicators. The steering committee

(*) 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*.

monitors progress in implementing the road map. If needed, other country analyses may be developed to better identify potential issues and risks when preparing a response to a call for tenders.

Business lines and divisions also continued to develop relevant indicators to measure their progress in implementing human rights policy. For example, VINCI Construction Grands Projets had its projects assessed and used the results to develop a set of indicators that are presented monthly to the management committee. The indicators provide information on assessments, monitoring, progress and actions to be taken. Action plans are regularly reviewed with the aim of continuous improvement, and follow-up audits are carried out.

Human rights assessments carried out across the Group^(*)

- 70 Group subsidiaries and active projects in 29 countries assessed since 2018
- More than 19,000 employees in the Group covered by human rights assessments conducted since 2018, amounting to over 16% of the Group's workforce outside of France and 45% of its workforce in non-OECD member countries
- 72% of the workforce in high-priority countries identified by the Group covered by human rights assessments conducted to date, with the goal to achieve 100% coverage.

() The 2021 action plan is based on data at 31 December 2020.*

4.3.7 Reinforced vigilance to fight forced labour and illegal work

The Group has long been committed to the fight against forced labour. Because forced labour is such a serious risk, VINCI is particularly aware that special scrutiny must be paid to the conditions in which migrant workers are recruited and employed, whether directly or indirectly via labour suppliers or subcontractor companies. Many problems may arise early in the recruitment phase, even before workers arrive at the project site or are hired by the Group.

The underlying factors driving forced labour can vary from region to region. VINCI considers that this issue must be handled close to where the problem occurs in order to take effective actions that are adapted to the on-the-ground realities. The risk of forced labour can come from certain legislative frameworks that do not align with international conventions or arise from unfair local practices, which are sometimes deeply embedded. The risk intensifies when an activity depends on a high volume of low-skilled workers or where labour migration flows are significant.

Some workers migrate to another country to seek higher wages, and the construction sector offers attractive job opportunities. Although VINCI promotes local sourcing of labour, the Group's companies may recruit migrant workers to meet their business's needs in certain regions, mainly due to local labour shortages. Once workers migrate for work, they become dependent on their employer not only for their employment but also with regard to their living conditions and accommodation. They are more vulnerable than other workers and face a greater risk of exploitation. This risk is amplified if they do not speak the language of the host country, are unfamiliar with cultural norms or have a limited understanding of their rights.

In addition to using its experience in Qatar to reinforce policies and internal practices across the Group, VINCI collaborates with many stakeholders to help improve practices in the ecosystem.

• Preventing risks relating to recruitment practices in Qatar

VINCI is present in Qatar via Qatari Diar VINCI Construction (QDVC). Since 2007, QDVC has taken concrete measures to improve migrant workers' living and working conditions and to prevent the risk of forced labour at every stage in the migration cycle.

To eliminate debt bondage and contract substitution, which are major contributing factors 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. A full 100% of the contracts signed prohibit agencies from charging recruitment fees and include a reference to the Employer Pays Principle (<https://www.ihrb.org/employerpays/the-employer-pays-principle>) supported by VINCI, along with strict clauses to ensure its application, and the obligation to monitor downstream compliance.

QDVC employees have visited agencies in home countries on several occasions to verify compliance with rules, spread the information among applicants that recruitment is free, examine the actual working conditions offered and participate directly in recruitment interviews.

QDVC carries out human rights audits of subcontractors, during which it inspects sites, verifies records and documents and interviews workers. In 2021, QDVC conducted 29 audits of its 22 subcontractors and temporary employment agencies, of which nine focused on working conditions (covering 87% of temporary workers and subcontractor employees on site) and 20 looked at living conditions (100% of subcontractors' accommodation having been audited at least once). The average CSR score for subcontractors rose to 81% in 2021, an improvement of eight points over 2020. For the early prevention of any risks to workers' rights related to subcontracting, audits are also carried out during the pre-qualification and selection phases, in addition to during contract execution. Accordingly, QDVC conducted 160 pre-qualification audits in 2021.

87%

of temporary workers and subcontractor employees on site are covered by an audit of working conditions

As a complement to the audits, the company conducts anonymous surveys of workers at different periods of time, to encourage them to respond freely and to assess the effectiveness of its measures. QDVC's recruitment process, the risk prevention measures taken and a list of the recruitment agencies used are detailed in VINCI's public response to the survey conducted by the Business and Human Rights Resource Centre (<https://www.business-humanrights.org/en/latest-news/vinciqdvc-response-to-2018-construction-survey-re-migrant-workers/>). The latest report by the Centre (<https://media.business-humanrights.org/media/documents/files/BHRRC-Shaky-Ground-Construction-Briefing-v1.1.pdf>) 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 subcontracting risks and consultation and grievance procedures.

Regarding freedom of movement, all QDVC workers hold a Qatari residence permit, which is required to move freely within the country. They also have access to a safe in which they can store their personal documents (passports, employment contracts, etc.). If any worker chooses to leave employment, QDVC systematically issues a "No Objection Certificate" (NOC) enabling them to work for a different employer. It also delivers exit permits to workers who wish to leave the country for a holiday, an emergency, or any other reason. These were already QDVC's practices long before the Qatar government's 2020 reform of the *kafala* (sponsorship) system.

QDVC also provides employee representation and grievance procedures to 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. QDVC has held regular elections for employee representatives since 2016. That year, QDVC's election was the first of its kind in Qatar. The company also provides resources to candidates to assist them with their campaign and with their work as an employee representative, once elected. In accordance with the terms of the 2017 framework agreement, Building and Wood Workers' International (BWI) trains employee representatives in Doha, with support from QDVC and VINCI. Since 2016, QDVC has formally requested that all its subcontractors and labour suppliers facilitate the free election of workers' committees. QDVC offers assistance to its subcontractors in establishing these elections and verifies compliance during audits of human rights performance and living conditions. In addition, QDVC has developed internal systems to enable workers to report concerns in their own language to Corporate Social Responsibility (CSR) or Quality, Safety and Environment (QSE) officers. Since 2017, an independent grievance procedure has been in place to enable employees of QDVC or of its subcontractors to approach BWI. This independent channel has proven effective, since BWI has handled complaints from employees, including those of subcontractors.

QDVC is the first Qatari company to sign an agreement with a labour union and hold free elections of workers' committees

Given the complexity and the structural nature of human rights risks, VINCI and QDVC strive to take a comprehensive approach by collaborating with multiple stakeholders, including trade unions, universities, NGOs, international organisations and government authorities.

A notable example of this joint work is QDVC's participation in a study on ethical recruitment run by the New York University Stern Center for Business and Human Rights. Based on quantitative and qualitative information provided by QDVC and interviews with workers, managers, labour suppliers and subcontractors, the report acknowledged the effectiveness of the due diligence measures in place and considered that "QDVC's standard represents the most responsible recruitment practice that currently exists in the industry" (https://media.business-humanrights.org/media/documents/files/documents/NYU_Qatar20SSP20Report_May29_v2.pdf). The study aimed to determine whether QDVC's responsible recruitment practices could be replicated elsewhere in construction or other industries to promote the rights of migrant workers.

In another example, in May 2018, QDVC entered into a public-private partnership with the ILO Project Office in Qatar to create a migration corridor between Qatar and Bangladesh with no recruitment fees for workers. After an initial audit performed by the NGO Verité, a complete capacity-building programme was rolled out for recruitment and placement agencies in Qatar and in home countries. Follow-up meetings to provide support have been held in Dhaka and Doha. To evaluate the impact of ethical recruitment on 343 workers and their employers, an independent assessment was conducted, based on interviews with workers at various stages of the recruitment process and during their employment. The findings of this pilot project were published at the end of 2021 (https://www.ilo.org/beirut/projects/qatar-office/WCMS_820253/lang--en/index.htm).

One of the conclusions was that the capacity-building workshops resulted in an immediate and profound improvement of placement agency practices. Placement agencies improved the drafting and terms of contracts with recruitment agencies in home countries and followed the use of subagents more closely, in particular by providing a transparent breakdown of costs. The ILO intends to replicate the pilot study in other countries and industries. VINCI regularly provides testimonials to other companies, government authorities and customers about the pilot study carried out with ILO and the ethical recruitment practices used. It also participates in training sessions delivered by the ILO.

The pilot enabled the practices employed by VINCI/QDVC, ranging from responsible recruitment to introducing workers' committee elections, to be presented by various stakeholders as an example to be followed by other companies in Qatar. Though innovative at the time they were first implemented by VINCI, these practices are now widely accepted and encouraged. VINCI created a dedicated page on its website to facilitate access to information and documents relating to its human rights initiatives in Qatar (<https://bit.ly/3H5Zusj>).

Impacts of the pilot project

- A major reduction of workers' debt: after the pilot project, 93% of the workers had no debt related to migration, versus 45% before the pilot
- A significant reduction in recruitment fees for the 7% of workers with debt: average fees fell from \$3,408 before the new measures implemented by the placement agency to \$300 after the pilot by QDVC and the ILO
- Effective grievance procedures

- **Spreading practices and lessons learned across the Group**

VINCI has used its experience in Qatar to enhance internal practices and policies in all its operations. The Group strives to provide its teams with operational guidelines. Accordingly, it has translated the risk of forced labour into more concrete factors: the risk of recruitment fees and debt; the risk of employment contract substitution and the risk of confiscation of workers' working permits, identity documents, visas, and passports. The guidelines also cover risks relating to working conditions (wages, working hours, etc.), accommodation and value chain practices. All of the tools developed to implement the Group's human rights policy, from risk maps to assessment scorecards, address these risk factors. The Group is also developing training courses based on case studies to train managers in detecting and preventing the risk of forced labour. VINCI keeps a close eye on any new tools developed by human rights organisations that may be useful to companies in the Group. For example, in 2021 VINCI tested the Cumulus platform designed by the NGO Verité for several of its operations. It helps companies to identify forced labour risks in supply chains, including in the construction industry. As a member of the Leadership Group for Responsible Recruitment (<https://www.ihrb.org/employerpays/leadership-group-for-responsible-recruitment>), VINCI also participated in its reporting process on recruitment practices and the risk of forced labour in all its operations.

- **Preventing social risks and illegal work 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 preventing social risks and illegal work in its supply chain in France. In 2018, VINCI introduced new measures to further reinforce its risk prevention and launched several pilot projects in construction businesses in the Greater Paris area. These enhanced measures were gradually rolled out in a broader mix of business activities.

The methodology followed involves three phases:

- survey and mapping of social risks in subcontracting based on purchasing category;
- assessment of the effectiveness of the entity's existing risk prevention measures;
- action plan incorporating measures such as responsibility assignment matrices, CSR assessments of subcontractors and reinforced vigilance measures for purchasing categories involving the highest levels of risk.

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.). The work was conducted across the main support functions (such as human resources, legal, purchasing and risk prevention) and in collaboration with employee representatives. VINCI Construction France formed a steering committee at its top management level. In all, several hundred participants in the chain of operations contributed their input to the diagnoses. Each regional division was asked to develop a responsible subcontracting policy, tailored to its business activities, organisation, local issues and the region's socio-economic situation, and build an action plan covering 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.

To support these efforts, a solution was developed to help maintain a database of reliable subcontractors. Works managers can use it to assess the subcontractors employed at their worksites against a shared set of criteria, which incorporates social risks. Assessments entered by other departments can also facilitate the initial selection of a subcontractor. This data sharing enables VINCI companies to take a more consistent approach to their work with subcontractors, quickly issue warnings in the event of a risk or nonconformity and support them as needed.

Social audits of subcontractors at worksites have been carried out since 2019. The audit procedure has been 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, overseen by external auditors, 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 serves to fine-tune prevention initiatives and, if applicable, update the risk map or assessments of partner companies. Follow-up audits are launched to 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.

To strengthen in-house skills in this area, in 2021, VINCI developed a toolkit for use in training its teams in conducting social audits of subcontractors. The Group's goal is to continuously monitor subcontractors associated with higher risks, while also expanding social auditing practices. The training of in-house trainers will begin in 2022. The toolkit they receive includes resources such as a guide to the methodology, an auditing scorecard, an interview scorecard for interviews with employees of subcontractors, a standard audit plan, standard letters for communicating with subcontractors and other documents.

VINCI Immobilier has 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. Implementation is in progress.

The methodology and its results were shared with professional organisations and certain customers and project managers with which VINCI companies work in France. In 2020 and 2021, VINCI also held discussions with representatives of Syndex, commissioned by the European Federation of Building and Woodworkers (EFBWW). The aim was to develop a toolkit to empower European Works Council representatives to monitor compliance with employment and social protection rules in construction industry supply chains.

- **Exerting influence over the value chain**

One of the main challenges in the fight against forced labour is its complexity, which requires collaborative, multi-party action by governments, businesses, international organisations, labour unions, NGOs, professional organisations, etc. to comprehensively address the issue. Although VINCI is a large company, its position in the value chain and its volume of activity in a given country or project is often limited, which can lessen its degree of local influence. Due to the inherent characteristics of the risk, in addition to those of the construction industry, VINCI strives to share its practices and challenges with the business community and the industry as a whole, to promote responsible recruitment and help create a virtuous ecosystem.

As part of the Building Responsibly initiative, whose principles include fighting against forced labour and promoting responsible recruitment practices, VINCI made a significant contribution to the policy brief on recruitment. In 2020, VINCI also published the first case study on its recruitment practices in Qatar (<https://www.building-responsibly.org/s/Building-Responsibly-Case-on-Study-Principle-3-VINCI.pdf>). Its purpose is to share practical applications in companies and information that can be useful to other businesses. This is an essential aspect of the initiative, whether for developing tools or facilitating dialogue with stakeholders.

Aware of the importance of raising awareness and training the next generation of engineers, VINCI collaborated with independent experts specialising in business and human rights to build a business case study for students. The case study contains a detailed examination of the risks of forced labour in Qatar and the measures implemented by QDVC. It has been made available to a large number of universities, in several countries, as well as the Conférence des Grandes Écoles in France and the Business and Human Rights Teaching Forum.

As a member of the Leadership Group for Responsible Recruitment, VINCI supports the Employer Pays Principle and regularly provides testimonials at conferences, seminars and meetings hosted by other companies, international organisations, NGOs, public authorities, chambers of commerce and professional associations around the world.

VINCI is also an active member of Business for Inclusive Growth's (B4IG) working group for advancing human rights and fighting forced labour. One focus of the working group is to share common tools to identify and mitigate the risks faced by temporary workers in supply chains. These tools include pre-qualification questionnaires for temporary employment agencies and human rights assessment guidance. A second working group was created to enhance due diligence measures in member companies for the responsible recruitment of migrant workers in Gulf countries. It aims to replicate, in the United Arab Emirates, the pilot project run by VINCI and the ILO Project Office in Qatar.

4.4 Duty of vigilance with regard to the environment

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, leading to the definition of a new environmental ambition involving all VINCI entities for the 2020-2030 period. The ambition targets three areas corresponding to the material issues for the Group's activities: acting for the climate, optimising resources thanks to the circular economy and preserving natural environments. The Environment Department coordinates the ambition across the Group's entities and each year it reports twice to the Executive Committee and three times to the European Works Council. It 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 800 correspondents.

On 6 November 2020, Xavier Huillard, Chairman and Chief Executive Officer 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 and all subsidiaries are responsible for ensuring that appropriate actions are also taken by subcontractors and joint contractors throughout projects.

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. VINCI's environmental ambition extends the environmental actions of VINCI companies beyond compliance with the regulatory requirements of the countries in which they operate.

With regard to the environment, measures to identify and prevent risks are closely tied to the operational context of companies, their activities and the vulnerability of the surrounding area. The Group's environmental policy is translated into operational guidelines in each of its business lines. Each business line establishes a road map taking into account the specific nature of its activities and regions, with the aim to drive continuous improvement. In subsidiaries, chief executives and senior management are in charge of ensuring regulatory compliance and the implementation of risk prevention procedures in their operational scope, taking into account their specific activities and challenges. They are assisted by the network of environmental correspondents, who provide environmental expertise.

4.4.1 Mapping of the Group's major risks

a. Identification of VINCI's material issues

In 2017, the Group established a risk map, which it updated in 2019, working with an outside provider to ensure a thorough assessment using valid methodology. The mapping involved an analysis of the vulnerability of the Group's activities to the physical risks associated with extreme weather events looking ahead to 2050, using data from the RCP 4.5 scenario in the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC). In collaboration with the environmental managers of VINCI companies, the risks for their main operational business activities were mapped in the following manner:

- identification of about 15 inherent environmental risks, based on a materiality assessment, industry knowledge and complementary bibliographical research;
- rating by the business lines' environmental managers against three criteria: severity, probability of occurrence and degree of control (based on existing governance, processes and tools to manage the risks);
- summary of inherent and residual environmental risks at Group and business-line levels.

To identify the material environmental issues for the Group's activities, in addition to the mapping of physical risks associated with extreme weather events, a broader analysis of main environmental risks for each business activity was performed. As a result of this risk assessment for each of the 15 business activities, specific actions plans for each risk were developed.

The geographical factor was also taken into account; main environmental risks were identified for each country where the Group is present. The reported 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; and water depletion. VINCI also produced a map positioning its countries of operation based on local environmental regulations.

These analyses served to identify the main risks for the Group's activities, as well as the different risk management strategies available and their suitability.

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 operating 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 infrastructure under concession (motorways, airports); – operation and maintenance of the infrastructure and buildings. In addition, some projects contribute to urbanisation and soil sealing, which may have an influence on the occurrence and consequences of extreme weather events (floods, heatwaves, etc.).	– Emergence of new regulations relating to the climate transition – 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 degradation of natural environments and constitute a nuisance for local populations, while contributing to the depletion of certain virgin raw materials.	– Risks related to waste production, processing and disposal – Increasing scarcity of resources
Preservation of 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 – Degradation of natural environments – Risk of working on a degraded or polluted parcel of land – Expansion of areas of water stress

Focus on climate change

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 enabling our society to keep global warming below two degrees by the end of the century: a "pro-technology" scenario, in which technological innovations would deliver major reductions in emissions without changing lifestyles, and a "sufficiency" scenario, in which growing collective awareness would lead to significant transformations in production and consumption practices. 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 for the construction sector in France and another for mobility in North America. In any scenario, it seems inevitable that the unprecedented development of low-carbon technologies will need to be combined with more energy-efficient and resource-efficient patterns of consumption. VINCI's business lines have been 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.

• **Regulatory risk**

Based on the results of this scenario analysis, the main climate-related risk to which VINCI is exposed, and whose exposure is expected to increase in the future, is regulatory risk. 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, such as France's new environmental regulation adopted in 2020 (RE 2020). As a construction industry leader, VINCI must supply products that meet these standards. Non-compliance with regulations could expose the Group 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.

• **Acute physical risks**

In addition to the environmental risk mapping described earlier, entities undertake specific work to anticipate and manage risks in the short- or medium-term that have been identified as major for their projects. They found 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 or motorways. 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), which can impact the works timetable. Changes in temperature can also 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 affect traffic patterns where VINCI operates motorways, airports and other infrastructure under concession contracts.

- **Technological and market evolutions**

In addition to assessing and mitigating the climate impact of its activities, VINCI analyses the opportunities that climate change brings to its activities. Technological and market evolutions are enabling VINCI to deliver new environmental solutions to its customers. VINCI's research and development efforts are focused on creating low-carbon and energy-efficient products and services.

A scenario analysis has confirmed VINCI's belief that urgent action is needed and that profound changes are in store for its businesses. These major transformations are a source of risks as well as opportunities. The long-term prospects of VINCI's activities and its continued market leadership will depend on its ability to recognise and anticipate these risks and opportunities. Group entities are taking major steps to meet this challenge.

4.4.2 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 the 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 205).

ISO 14001 certifications at VINCI in 2021

- VINCI Autoroutes: 100% of kilometres in service
- VINCI Concessions: 77% of revenue (89% for VINCI Airports)
- VINCI Energies: 50% of revenue
- VINCI Construction (excluding Eurovia): 86% of revenue
- Eurovia: 36% of revenue from works activity, 56% from quarries owned, 63% from coating plants owned, 54% from binder plants owned

- **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 and 2021 (see paragraph 3.4.3, "Procedures related to commitments and the VINCI Risk Committee", in chapter D, "Risk factors and management procedures", page 169).

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 Bionécessité 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 no. 82-1153 of 30 December 1982), for new transport connections
VINCI Airports	<ul style="list-style-type: none"> – Environmental due diligence for projects under development in order to analyse and manage environmental risks at the earliest possible stage of a project – Internal environmental audits for 23 airports with ISO 14001 certification
VINCI Energies	<ul style="list-style-type: none"> – Achievement by VINCI Energies France of the Gold rating from EcoVadis, which assesses the quality of a company’s sustainability management system, in 2021 – Risk assessment and environmental health and safety 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 nonconformities into measures for inclusion in action plans
VINCI Construction	<ul style="list-style-type: none"> – Achievement by Eurovia France of the Gold rating from EcoVadis, which assesses the quality of a company’s sustainability management system, in 2021 – Assessment of environmental risks for activities being acquired or for investments in quarries or production plants – Internal assessment of environmental risks for each project using a questionnaire based on local regulations and ISO 14001 (VINCI Construction Terrassement) – Regulatory watch developed in all VINCI Construction businesses – 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 – Annual environmental audit (incorporated into the integrated management system) for all divisions, which are all ISO 14001 certified, and monthly health, safety and environment (HSE) inspections by management for each project (Sogea-Satorm) – Regulatory compliance audits (125 in France in 2021 for Eurovia entities) – 35 internal compliance audits in 2021 using a set of 115 items to assess worksite performance (VINCI Construction Terrassement) and 36 internal audits for Eurovia, covering 25% of works agencies, to verify the implementation of environmental action plans – Development of a specific environmental acceptability and certification process for Eurovia France production plants – Internal audits of worksites applying for the Attitude Environnement label (VINCI Construction France) or the Excellence Environnement label (Eurovia) – 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 by works management after service completion, using a dedicated internal tool (Dodin Campenon Bernard and VINCI Construction Terrassement)
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 2.2.1, “Group-wide approach to promote responsible purchasing”, page 197, 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. For purchasing categories that significantly impact revenue or carry high social or environmental risks, a separate analysis is performed and a specific CSR questionnaire is used to assess suppliers. Based on the results, a supplier may be excluded from a tender process or be invited to set up an action plan, complete with measures to verify its implementation. In 2021, 20 new suppliers were assessed using this approach and only nine were approved.

The VINCI holding company and some Group entities may also 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.

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 assessment 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"> - Analysis in progress to identify and assess the main social and environmental risks for each purchasing category
VINCI Energies	<ul style="list-style-type: none"> - Yearly or half-yearly assessment by each company of their top 10 suppliers and top five subcontractors, using a questionnaire, followed by work with suppliers on their identified areas for improvement - Assessment of VINCI Energies suppliers, using the Actradis platform
VINCI Construction	<ul style="list-style-type: none"> - New questionnaires for specific purchasing categories developed in 2021 to assess suppliers' environmental and other commitments. The questionnaires were sent to all suppliers having participated in a tender in 2021, to distinguish the best environmental performers. Improvement action plans were developed jointly with them. Fifty suppliers, representing a purchasing volume of €250 million, received support in this form in 2021, in connection with framework agreements managed by Eurovia's head office. - 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 2021, 284 environmental assessments were performed at VINCI Construction Terrassement. - Environmental criteria included in annual assessments of subcontractors and suppliers (Sogea-Satom)

4.4.3 Tailored actions to mitigate risks and 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 protection 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	Commitments
Climate change	<ul style="list-style-type: none"> - Reduce the Group's direct greenhouse gas emissions (Scopes 1 and 2) by 40% by 2030 compared with 2018 levels - Reduce indirect emissions (Scope 3) by 20% between 2019 and 2030, taking action across the entire value chain for the Group's businesses - Adapt structures and activities to improve their climate change resilience
Resources and the circular economy	<ul style="list-style-type: none"> - Promote the use of construction techniques and materials that economise on natural resources - Improve waste sorting and recovery - Expand the offer of recycled materials to limit extraction of virgin materials
Preservation of natural environments	<ul style="list-style-type: none"> - Prevent pollution and incidents by systematically 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

To achieve its environmental ambition, the Group implements environmental risk prevention management systems at Group entities (see paragraph 3.1.1.2, "Turning risk management into opportunity," page 205), which also cover their worksites and sites under operation. For example, VINCI Immobilier applies its own clean worksite charter that enumerates obligations for all companies operating at the worksite, to monitor and reduce nuisances and environmental impacts.

Several initiatives have been taken by VINCI Construction entities in addition to obtaining ISO 14001 certification.

- For example, 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. Since 2020, it has 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.

Various business lines, divisions and subsidiaries also develop internal labels to prevent risks specific to their business activities. In 2021, 31 Eurovia worksites received the in-house Environmental Excellence label, more than 300 VINCI Construction France worksites were certified with the Attitude Environnement label and nine worksites were awarded the new green label created by VINCI Construction Terrassement in 2021 to recognise worksites that have done an exemplary job in protecting the environment.

In the Concessions business, VINCI Concessions is expanding ISO 14001 certification to enhance risk prevention in 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.

Furthermore, business lines conduct awareness and training initiatives (see paragraph 3.1.3, “Employee training and awareness”, page 208). Regular 15-minute environmental sessions at worksites build awareness among employees and subcontractors alike. In 2021, 51,837 hours of environmental training were provided (52,891 in 2020).

• Mitigating and adapting to climate change

Climate change is 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. According to climate models published by the Intergovernmental Panel on Climate Change (IPCC) in relation to the RCP 6.0 and RCP 8.5 scenarios, 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 changes that could affect all segments of our society. The IPCC’s Special Report on the impacts of global warming of 1.5°C above pre-industrial levels details the consequences for people and the planet even if emissions are reduced considerably, while the first instalment of its Sixth Assessment Report presents the most compelling evidence to date that human activities are causing climate change.

In response, VINCI has committed to taking concrete action. When it adopted its new environmental ambition in 2019, VINCI further strengthened the Group’s targets, looking to align itself with the Paris Agreement. The Group is therefore committed to achieving a 40% reduction in its Scope 1 and 2 GHG emissions by 2030 compared with 2018 levels (see paragraph 3.2, “Acting for the climate”, page 210). According to guidance from the Science Based Targets initiative (SBTi), this commitment makes the Group’s target setting strategy consistent with a reduction “well below 2°C”. In addition to this absolute value for its emissions reduction target, VINCI aims to reach carbon neutrality (by achieving net zero emissions) in its direct scope of business activities by 2050. VINCI also pledged in 2021 to reduce its Scope 3 indirect emissions by 20% by 2030 compared to the 2019 baseline. This commitment has been validated by the SBTi and is based on the emissions categories defined in the Greenhouse Gas Protocol (GHG Protocol).

To meet its objectives, VINCI is developing tools and action plans 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).

8%

reduction in greenhouse gas emissions between 2018 and 2021, excluding the impact of acquisitions

Some measures are being implemented by all Group companies (see the actions described in paragraph 3.2, “Acting for the climate”, page 210): 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), 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).

25%

of electricity used was from renewable sources in 2021

Group entities also deploy solutions to reduce emissions in the products and services they deliver in their business activities. For example, ensuring the energy efficiency of buildings under construction or renovation is a key objective for the Group. Accordingly, VINCI Construction 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 operating 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 and infrastructure 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 (see the actions described in paragraph 3.3, "Optimising resources thanks to the circular economy", page 221).

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.

15%
of recycled material in VINCI
Construction's total aggregate
production for 2021

Given their extensive international operations, VINCI's Concessions businesses must find alternatives to landfills for treating waste. To meet its goal of sending zero waste to landfills, VINCI Airports has built on-site sorting centres for its airports in Brazil and the Dominican Republic. VINCI Construction and VINCI Energies are also taking measures to promote the reuse of materials and equipment on worksites, in addition to waste sorting and recycling.

- **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 undertake risk analyses of their projects and implement measures to manage the identified risks (see the actions described in paragraph 3.4, "Preserving natural environments", page 226).

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, 90% 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. Some of Eurovia's quarry sites have implemented innovative systems to filter pumped water and minimise 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.

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. A reduction of just over 80% in the use of phytosanitary products (in litres) occurred between 2018 and 2021 for the Concessions business as a whole. As part of its commitments under the act4nature international initiative, VINCI has made a pledge to cease all use of phytosanitary products by 2030 (unless prevented by contractual or regulatory provisions).

37
airports used no phytosanitary
products in 2021

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.

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.

100%

of framework contracts signed by Purchasing Coordination included one or several environmental criteria in 2021

In 2019, the Group produced 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 introductory course to responsible purchasing was made available to all employees as an e-learning module, to help them absorb the content of the guide. By 31 December 2021, 2,400 employees had completed it. A more advanced course for Group purchasing roles was developed in 2021 and completed by 120 employees. Thirty trainers will continue to deliver this new training in business lines. VINCI Autoroutes has developed its own 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.

The Group has undertaken additional work to prevent risks across its most important industry sectors and purchasing categories. Eurovia France and VINCI Construction France established a list of their priority purchasing categories, notably including those categories exposed to social and environmental risks, and mapped them for each entity. Discussions with certain strategic suppliers (for example, fuel and concrete) were initiated with a view to reducing Scope 3 emissions. In 2021, the Group continued to assess concrete suppliers against environmental criteria (such as greenhouse gas emission thresholds), to expand its sourcing of low-carbon concrete. With respect to wood used for the frames and facades of structures, VINCI companies specialising in timber-frame construction source a very large majority (over 80%) of their wood from PEFC- or FSC-certified sustainably managed forests. In 2021, VINCI also completed its second CDP Forests assessment and received the score of C, which recognises the Group's awareness of deforestation and forest degradation risks and best practices.

4.4.4 Group alert mechanisms and processing of reports

VINCI 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.

4.4.5 Monitoring measures put in place and their effectiveness

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, see the cross-reference table, page 375), the recommendations of the Task Force on Climate-related Financial Disclosures (see the cross-reference table, page 377) and the Sustainability Accounting Standards Board framework (see the cross-reference table, pages 378). 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.

This monitoring and assessment work accompanies 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. The goals are regularly reviewed by VINCI's Executive Committee and Board of Directors.

99%

of Group revenue is covered by environmental reporting

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

The Ethics and Vigilance Department supports the implementation of the Group's compliance programmes, in addition to procedures for raising concerns in specific areas of risk. It is responsible for VINCI's whistleblowing system (see paragraph 2.4, "Business ethics", page 201) and reports to the Group's Executive Management.

- **A procedure available to all stakeholders**

The Group has set up a unique whistleblowing system, called VINCI Integrity, which 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 violates 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.

Employees inform their direct or indirect supervisor, or an officer designated for this purpose within the entity to which they belong. Employees can use the whistleblowing system available in their entity, contact the Group's Ethics Officer directly, or use VINCI Integrity, the Group's whistleblowing platform. VINCI guarantees that no employee will be disciplined, dismissed, or retaliated against in any way, whether directly or indirectly, for having reported or given evidence, under the whistleblowing procedure and in good faith, concerning acts of which the employee obtained personal knowledge during the course of their 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 and report concerns.

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



This universal registration document was filed on 28 February 2022 with the Autorité des Marchés Financiers (AMF, the French securities regulator), as competent authority under Regulation (EU) 2017/1129, without prior approval pursuant to Article 9 of the said regulation.

The universal registration document may be used for the purposes of an offer to the public of securities or the admission of securities to trading on a regulated market if accompanied by a prospectus and a summary of all amendments, if any, made to the universal registration document. The set of documents thus formed is approved by the AMF in accordance with Regulation (EU) 2017/1129.

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