

# 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 2022, it met four times. It reports annually on its activity 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 2022

**1,737** companies, of which **66%** have fewer than **100** employees

**314,000** worksites and projects in 2022

**271,648** staff worldwide in more than **120** countries



**71.4%**  
Europe

**17.4%**  
Americas

**5.5%**  
Africa

**3.7%**  
Asia and  
the Middle East

**1.9%**  
Oceania

**82.3%**  
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 Group's 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 214).

**34%**  
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 their 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  
 (excluding Cobra IS)

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

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 paragraph 1.2, "Health, safety and security of employees, temporary staff and subcontractors", of the "Workforce-related performance" section, pages 193 to 196).

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 in 2017, "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/vinci.nsf/en/item/ethics-and-vigilance-documentation.htm>). 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 serious 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 Group's 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 driving improvements. For example, it has launched initiatives across business lines enabling them to reduce risks associated with the lifting and moving of heavy objects, electrocution risk and road accidents caused by third parties.

The Health and Safety Coordination unit meets regularly with the Executive Committee to debrief and discuss accidents and significant events. It also convenes to assess the sector's human resources needs and promote mobility.

In addition, the unit launches foresight approaches to address emerging business risks and takes action to develop innovation in health and safety.

Leonard, VINCI's innovation and foresight platform, has coordinated a mission to foster innovation in safety and prevention. It applied an approach divided into three parts:

- "Catalyst", to list safety innovations within and outside the Group;
- "Artificial Intelligence", to identify solutions that optimise data and make use of predictive AI technology;
- "Foresight", to identify new risks that will arise or increase in the future.

Different innovative solutions have been identified and are now being tested; several of these show promise. One example is the "Lifeguard" safety system, which detects the presence of pedestrians near machinery. The system captures images with video cameras and uses artificial intelligence to analyse them, instantly detecting when pedestrians are in the vicinity.

Leonard is continuing this mission, which will encompass environmental foresight approaches that have an impact on employees' health and safety at work. The "Catalyst" component will also be expanded to include health innovations.

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 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 and updates this risk map every year.

The risk mapping identified eight 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.

These major categories of risks to people’s health and safety are presented in the table below.

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
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	Projection of high-pressure fluids Projection of pressure machinery parts
Risks relating to handheld mechanical tools	Cuts and punctures from sharp handheld mechanical tools
Risks relating to road traffic	Road accidents
Risks on the road during safety, maintenance or construction activities	Collision with third-party vehicles
Electrical risk	Electrocution

### 4.2.3 Preventing health and psychosocial risks

Preventing and responding to psychosocial risks has been an important focus since the start of the Covid-19 pandemic. At many VINCI sites, measures were introduced at the outset to raise awareness, provide training to managers and support employees. The range of initiatives undertaken include setting up help hotlines, offering psychological counselling, training employees to recognise signs of depression and situations of distress, and organising events dealing with mental health and stress management.

Group companies have also collaborated with public authorities and specialised service providers to launch health awareness campaigns, for example, to promote the importance of exercise and a healthy diet in preventing multiple chronic diseases. Other initiatives include individual counselling with a dietician and screening for diabetes and heart disease. The main fixed sites and production sites have been equipped with a large number of defibrillators.

Awareness campaigns have been carried out in various regions worldwide to focus on certain addictions (smoking, alcohol, drugs, etc.) and diseases (such as cancer, AIDS, and Alzheimer’s). Each one aims to inform employees and get them involved, while creating opportunities for team-building and mutual support through challenges and group activities. Companies are also renewing equipment and tools as well as reorganising work conditions to reduce workers’ exposure to the risks of musculoskeletal disorders (MSD). For example, employees have been trained to help their colleagues adjust their practices and to lead warm-up exercises before starting work.

A special ergonomics group has been created within the Group’s community of health and safety specialists to promote good posture and proper body mechanics for performing work activities across all business lines. Innovations such as the exoskeletons developed at VINCI Construction or the equipment to facilitate manual baggage handling at VINCI Airports are helping to reduce physical effort and strain for employees.

### 4.2.4 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.

VINCI Concessions has 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 is available in 12 languages and has been 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 launched 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. VINCI Energies also takes into account the organisational and human factors that affect the six pillars of its safety culture.

At VINCI Construction, the safety culture is supported by three core values: transparency, exemplary conduct and dialogue. Its “Building in safety” guidelines provide a methodological framework for managing risks at each of a project’s key stages, incorporating safety concerns into work instructions and procedures early on, 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” guidelines also encourage participants to stop and alert their supervisor. Most VINCI Construction entities combine this methodology with golden rules to be followed by all workers to prevent major risks. They also apply many other country-specific and business-specific guidelines to improve the management of these risks. VINCI Construction conducted a survey of health and safety climate perceptions, to which more than 33,000 employees responded, and held workshops to discuss the findings. Many of its entities carry out a root cause analysis after an accident or near miss.

Similarly, Cobra IS implements the use of stop cards, empowering every worker to stop a work process if they see a potential risk in its execution or simply a lack of planning before taking action.

After observing a new increase in maintenance van collisions, VINCI Autoroutes stepped up its action plan to prevent these accidents. The business line first overhauled the training and retraining of personnel working on motorways. Next, it collaborated with government agencies to update work procedures and implement technological solutions such as video surveillance and AI-based collision avoidance systems. It also ran large-scale communications campaigns, using media such as travelling exhibits and videos, to raise public awareness of the problem.

#### 4.2.5 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 2022, 64 health, safety and prevention agreements were signed by Group companies (25 in 2021). 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, in France, companies of any size are advised to hold a regular economic and social committee (CSE) 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.

**1,660**

meetings of health, safety and working conditions committees across the Group in 2022

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. 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.

- **Engaging employees in everyday prevention through reporting and alert procedures**

The "Essential and Fundamental Actions Concerning Occupational Health and Safety" joint declaration emphasises that any situation observed by employees that represents an imminent threat to health and safety must be immediately reported to the relevant superior and that no employee can be reprimanded for making such a report. Likewise, depending on the operational context, employees in any of the Group's business lines or countries of operation 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.

In addition to MoveSafe, an application for the electronic reporting of dangerous situations and near misses, VINCI Autoroutes has developed and launched Jarvis. This new application helps to maintain records of 15-minute prevention sessions; record and report on prevention inspections; and keep product safety data sheets available at all times.

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, smartphone applications like Watch and Notify make it easy for any employee to report a hazardous situation or a best practice observed at a worksite. 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, 15-minute safety sessions and stop cards. 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 health, safety and environment (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 been employed to re-enact accidents and potentially serious incidents and better analyse the root causes. It was 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.

**44%**  
 of training hours in 2022 devoted  
 to health and safety, totalling  
 more than 2.5 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 2022, employees had access to more than 910 training resources in risk prevention and health and safety (650 in 2021), 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 was 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 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, the Group's business lines hold 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 safety performance.

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.

2022 marked 10 years since VINCI Autoroutes launched its "Zero Accident Programme Management" campaign to improve safety for all workers at construction sites, from the design phase to completion. Several events were held, with the participation of partners and outside companies, to celebrate the anniversary and share the progress achieved.

In 2022, each regional department invited outside experts to a day of workshops on the commonest hazardous situations and exchanging virtuous practices.

VINCI has implemented a framework agreement for use in France 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).

**23%**

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

#### 4.2.6 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.

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. Three VINCI Autoroutes concession companies with operations activities are ISO 45001 certified. 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 (excluding the Road France Division): 85% of activities (by revenue) certified ISO 45001 and 13% certified MASE
  - VINCI Construction (Road France Division): 49% of works activities (by revenue) certified ISO 45001
  - VINCI Energies: 45% of activities (by revenue) certified ISO 45001, 6% certified MASE and 13% certified SCC (Safety, Health and Environment Checklist for Contractors)
  - VINCI Autoroutes: 100% of in-service motorways certified ISO 45001
  - VINCI Concessions: 66% of activities (by revenue) certified ISO 45001

Including safety criteria in consultations with subcontractors is becoming systematic. Contractual clauses were shared throughout the Group to help introduce stricter safety requirements. The clauses create an obligation to report non-compliance with fundamental safety rules and take certain measures, not only in situations of joint activity but also in the subcontractor's own operations. Failure to do so can give rise to contract termination.

**4.2.7 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 a serious 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.

• **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 learn from them and prevent such incidents 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 2022**

- Lost-time workplace accident frequency rate, worldwide:
  - VINCI employees<sup>(\*)</sup>: 5.71 in 2022 (5.74 in 2021 and 6.60 in 2017)
  - Temporary staff: 13.03 in 2022 (13.54 in 2021 and 14.40 in 2017)
- Workplace accident severity rate (VINCI employees)<sup>(\*)</sup>: 0.40 in 2022 (0.42 in 2021 and 0.47 in 2017)
- Percentage of Group companies with no lost-time workplace accidents: 72% in 2022 (73% in 2021 and 72% in 2017)

**Definitions**

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

<sup>(\*)</sup> 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 be proactive in this area and develop operational responses. It considers that the human rights challenges faced and the solutions to be implemented are best tackled locally, close to its people and operations. Because it understands that these issues are complex, VINCI also engages in ongoing dialogue and collaboration 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 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 now.	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 the impacts.	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 ([https://www.vinci.com/publi/manifeste/vinci-guide\\_on\\_human\\_rights-en.pdf](https://www.vinci.com/publi/manifeste/vinci-guide_on_human_rights-en.pdf)), 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, available 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 2022 showed that by the end of September, 94% of the entities surveyed, all business lines and divisions combined, had communicated about the Guide to their employees. To facilitate the adoption and dissemination of the guidelines, the guide has been 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.

# 94%

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 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 on a continuous basis 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 introduced a whistleblowing system for raising concerns about human rights. 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 265).

#### • 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. 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**

- 27 country-specific human rights risk maps, developed with the support of an external provider, available in 2022
- 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 30% of the Group's international workforce (excluding France)<sup>(\*)</sup> and 80% of the workforce in countries identified by the Group as high priority<sup>(\*)</sup> with respect to these human rights risk assessments.

<sup>(\*)</sup> The 2022 action plan is based on data at 31 December 2021, not including data for Cobra IS.

**• 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.

To raise awareness of human rights risks, an e-learning course in five languages (English, French, Polish, Portuguese and Spanish), resulting from a year of collaborative in-house development, has been open to all entities and employees since 2019. It 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 2022, close to 16,500 employees in the target groups, in nearly 90 different countries, had finished the course (4,000 employees in 70 countries in 2021). A complementary course for managers of concessions has been developed since last year. It delivers an interactive presentation of the issues that may arise during a project's three phases: development, design and construction, and operation and 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 shared by all VINCI Construction divisions, designed to build the skills of managers of major projects and help them handle complex environments more effectively.

The CSR Department team also provides in-person training, on a continuous basis, to many management committees and employees of Group entities. At these sessions, the team members present the Group's human rights issues and risk management tools available and explore more specific topics such as minimum social protection, the living wage, or the latest regulatory updates on the duty of vigilance and supply chains.

**• Whistleblowing systems for raising concerns**

The Group also upholds its commitments by providing multiple channels by which employees can report concerns. These channels 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.

Apart from the whistleblowing system at Group level (see paragraph 4.4.4, "The Group's whistleblowing systems", page 281), due to VINCI's multi-local organisation and the nature of its activities, it also encourages the implementation of local procedures for reporting concerns. The Group's view is that whistleblowing systems and alert procedures are more effective when they are local, since the company, project or worksite is then better positioned to proactively handle reports, including those by end users and local residents, identify any weak areas and reinforce prevention. A number of Group companies have set up additional channels, other than the line manager, to report complaints or situations that present a risk, such as a human rights risk. These may be dedicated email addresses, hotlines or digital solutions. Some companies, such as LISEA in France and Lima Expresa 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 Via 40 Express in Colombia. In the Gulf countries, such as Qatar and the United Arab Emirates, specialised CSR coordinators are in charge of receiving any worker complaints, from direct and indirect employees, as well as maintaining a log and ensuring that the identified problems are quickly resolved.

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

**4.3.4 Assessing the situation of subsidiaries, subcontractors and suppliers**

**• Managing Human Rights, a tool to assess subsidiary practices**

The Managing Human Rights platform is used to evaluate whether the management systems implemented by subsidiaries 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. The entity or project then reports on the results and improvement plan 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.

When Group entities launch their assessment on the Managing Human Rights platform, they are asked some 200 questions. For example: Has the company checked that the workers did not have to pay a recruitment fee? Has it checked that temporary workers and subcontractor employees on its sites are not working excessive hours? Has it ensured that there are systems in place to inform and consult local residents and communities that could be impacted by projects? The questions are precise, concrete, and relate to the five salient human rights issues and 17 themes. The four response options range from "no practices" (Level 1) to "best practices" (Level 4). Any Level 1 or Level 2 answer to one of the 50 items considered to be a critical human rights issue automatically flags the latter as a priority. After the assessment – preferably carried out as a group exercise, involving all relevant managers and employees – the entity has a comprehensive view of its human rights practices and can use it to build an effective action plan.

In 2022, following updates to reflect user experience and critical feedback from several corporate and human rights experts, a finalised version of the digital tool was released on the [vinci.net](https://vinci.net) intranet for use by all Group employees, in English, French and Spanish. Managing Human Rights is an essential component of VINCI's human rights policy: since 2018, it has been used to assess practices covering 66% of our workforce in countries identified as high priority.

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

VINCI's Internal Audit Department has updated the risk scorecards used by the Group's 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 concessions, energy or construction 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 taken specific measures to prevent social risks in subcontracting (see "Preventing social risks and illegal work in subcontracting in France", page 271).

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 paragraph 4.2, "Duty of vigilance with regard to health and safety", page 255). 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 other 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 paragraph 2.2, "Relations with suppliers and subcontractors", of the "Social performance" section, page 214).

#### 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 issue

**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 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 recognised 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, <http://www.e-dh.org>), 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.
- **Business for Inclusive Growth** (B4IG) (<https://www.b4ig.org/>), of which VINCI has been a member since 2020. A partner of the Organisation for Economic Co-operation and Development (OECD), B4IG is a coalition of global companies working together to promote inclusive growth, in particular by advancing human rights, building inclusive workplaces, implementing living wages and measuring impacts.

**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. The latest 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 and the audit report was 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 thus carry out 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 five 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 adapt or reinforce certain 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<sup>(\*)</sup> 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 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.

(\*) 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*.

At the same time, business lines and divisions have developed indicators to track the implementation of human rights policy. For example, VINCI Construction Grands Projets developed a set of indicators that are monitored and presented monthly to the management committee. The indicators provide information on assessments, monitoring, progress and nonconformities to be corrected.

#### Human rights assessments carried out across the Group<sup>(\*)</sup>

- 81 Group subsidiaries and active projects in 32 countries assessed since 2018
- More than 23,000 employees in the Group covered by human rights assessments conducted since 2018, amounting to over 20% of the Group's workforce outside of France and 56% of its workforce in non-OECD member countries
- 66% 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 2022 action plan is based on data at 31 December 2021.*

#### • Risk mitigation measures

Besides carrying out additional assessments of human rights compliance, the Group monitored certain action plans in 2022, including those of entities located in high-priority countries such as Benin, the United Arab Emirates, Qatar, Bahrain, Egypt and Brazil.

In the next few years, the CSR Department will develop and test performance indicators to better measure the effectiveness of human rights risk mitigation. In 2022, VINCI collaborated with other companies – in particular, fellow members of Businesses for Human Rights – to identify the most meaningful human rights KPIs. This initiative will continue in 2023.

For example, the human rights audit of Lima Expresa, the concession operator for the Lima expressway in Peru, identified risks relating to the country's significant informal economy, especially in the subcontracting supply chain. The entity's ensuing action plan involved terminating work with certain subcontractors that did not properly declare their employees, introducing ad hoc clauses in all its contracts and conducting field inspections to ensure that everyone working at its construction and operating sites had a valid employment contract and proper social protection coverage. Lima Expresa applied all of the Group's recommendations, and in addition, its 600 employees, along with its subcontractors' workers, completed the human rights e-learning programme.

In the United Arab Emirates, where the law provides only limited freedom of association, 1,600 workers on a rail depot project were able to elect employee representatives in 2022. VINCI Construction's partner and the six main subcontractors involved in the project participated in the elections. Their representatives participate fully in the dialogue that has since been initiated, with regular meetings between employee representatives and the project's management team. In a VINCI Energies entity, also in the United Arab Emirates, a system is in place to ensure that workers take their holidays every year instead of asking for financial compensation in lieu of paid leave.

Elections of employee representatives were also held on an ETF rail worksite in Cairo, Egypt. At the same site, human resources managers received specific training in employment law, to enable them to create a learning module for all project workers to increase their knowledge of the legislation and their rights.

At a hydroelectric dam construction site in Senegal, as a result of the human rights policy, high-standard worker accommodation facilities (at least 24 sq. metres per four-person unit) were built. The number of workers recruited and locally trained is expected to reach one thousand at the peak activity level on this site. Another accommodation facility meeting the standards set out in VINCI's Guide on Human Rights was built in Sihanoukville, Cambodia.

The human rights performance assessments conducted by several French subsidiaries of Soletanche Bachy (VINCI Construction) led to action plans focusing on greater attention to health and safety, improving control of subcontractor activities and fulfilling contractual obligations. The companies will look for signs of poor performance in these areas and increase their monitoring of working conditions by conducting follow-up audits in 2023.

Generally speaking, in all the entities where audits were carried out, these were followed by monitoring, corrective action and improvements to recruitment practices and working and living conditions. The entities also formalised certain processes and showed a greater awareness of the risks related to the potential impacts of VINCI's activities on local communities.

### 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 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 2022, QDVC conducted audits of its 62 subcontractors and temporary employment agencies on site at the end of 2022. Of these, 35 examined working conditions (covering 40% of the temporary employment agencies and subcontractors on site) and 68 looked at living conditions (covering 82% of these companies). The subcontractors’ average score for the CSR audit, which combines the assessments for living conditions and working conditions, was 72%, a 35-point improvement over the results of their first audit, when they began working for QDVC.

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 124 pre-qualification audits of 85 companies in 2022. They led to the selection of 55 subcontractors for work with QDVC (30 companies, or 35%, were eliminated for not meeting CSR criteria).

QDVC also carried out spot checks on more than 1,000 of its subcontractors’ workers, during which its teams made unannounced on-site visits to verify that workers were in possession of their passport and a valid work permit, that they were receiving their salary in full in their bank account, that they had health insurance, that working hours were complied with, that their housing was satisfactory and that they were not asked to pay a recruitment fee to come work in Qatar.

**99%**  
 of QDVC’s temporary workers and subcontractors’ employees were covered by an audit of working and living conditions

In 2022, CSR due diligence in the value chain was further reinforced, for example by expanding auditing procedures to include sales development and contract acquisition activities and by applying stricter CSR criteria in selecting partners, customers and projects.

As a complement to the audits, the company conducts anonymous surveys of workers, at different periods of time, to encourage honest feedback and assess their well-being and the effectiveness of QDVC’s measures. These anonymous surveys administered by the CSR Department provide a channel for workers to openly share both positive and negative feedback about the company’s practices. The management creates an action plan after analysing the results. In 2022, 151 workers (out of 300) responded to the survey. The majority considered that QDVC performs well overall in terms of QHSE and CSR (71%) and are satisfied with how QDVC managed the Covid-19 pandemic (93%). A large majority are satisfied with their life in Qatar (86%) and with their current employment (88%). Most also stated that their professional and personal lives were well balanced (82%), would recommend QDVC to a friend (89%) and planned to stay on longer with QDVC (76%).

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-migrantworkers/>). The latest report by the Centre (<https://media.business-humanrights.org/media/documents/files/BHRRRC-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. In 2022, 50 issues were raised by employee representatives, and every one of them was resolved. Seventy-six percent of the employee representatives were satisfied with the solution proposed by the management team.

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

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.

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 New York University's 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\\_Qatar20SP20Report\\_May29\\_v2.pdf](https://media.business-humanrights.org/media/documents/files/documents/NYU_Qatar20SP20Report_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, between 2018 and 2021, QDVC participated in 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 Doha and Dhaka. 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](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 (<http://bit.ly/3Zei4lJ>).

**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, 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 workforce-related 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 then implemented at VINCI Construction throughout the rest of France before being 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, such as social audits.

VINCI Construction formed a steering committee at its top management level in France. 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 were performed 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. In 2022, several training sessions for in-house auditors were delivered in VINCI business units and divisions operating in France. These custom training sessions presented the workforce-related issues involved in subcontracting and the corresponding duty of vigilance of Group companies. Trainees were provided with a comprehensive guide to the methodology and a toolkit including an auditing scorecard and an interview scorecard for interviews with employees of subcontractors. The sessions ended with a module on interviewing techniques, along with case studies and role-playing activities.

Thanks to this support, several Group entities launched an internal audit procedure with a double goal: one, to assess the subcontracting management processes implemented by Group companies, and two, to audit subcontractors and help them manage their employees. The first round of feedback was gathered from the trained entities at the end of 2022. A road map is being developed, and new training sessions will begin in 2023.

For the Universeine project, north of Paris, which will be part of the athletes' village for the sporting events in the summer of 2024, a mapping of social risks, a diagnosis of existing tools and a social audit were all carried out in 2022. The audit examined the subcontracting management systems of four Group companies (from VINCI Construction France and VINCI Energies France), as well as four of their subcontractors. No major nonconformity was identified in the project's scope. Several improvement areas were highlighted, leading to the development of an action plan which enabled all moderate and minor nonconformities to be corrected within a few weeks.

The methodology and its results were shared with professional organisations and certain customers and project managers with which VINCI companies work in France.

#### • 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. It continued to be used in 2022.

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. This ambition targets three areas, aligning with the key challenges faced by the Group's businesses: climate change, the circular economy and the preservation of 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 for 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. As Cobra IS joined the Group in December 2021, this business line will be included in VINCI's environmental reporting in 2023.

### 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, performed by the engineering and design office Resalliance 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 action 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.

In 2022 this assessment was expanded to encompass the principle of “double materiality”. This concept distinguishes between financial materiality, which considers how environmental risks could affect the Group’s financial performance, and impact materiality, which considers how the Group’s activities could impact their environment. Impact materiality is assessed through interviews conducted with the Group’s environmental experts, applying the same approach as VINCI’s existing risk analysis procedures (see chapter D, “Risk factors and management procedures”, page 179).

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.

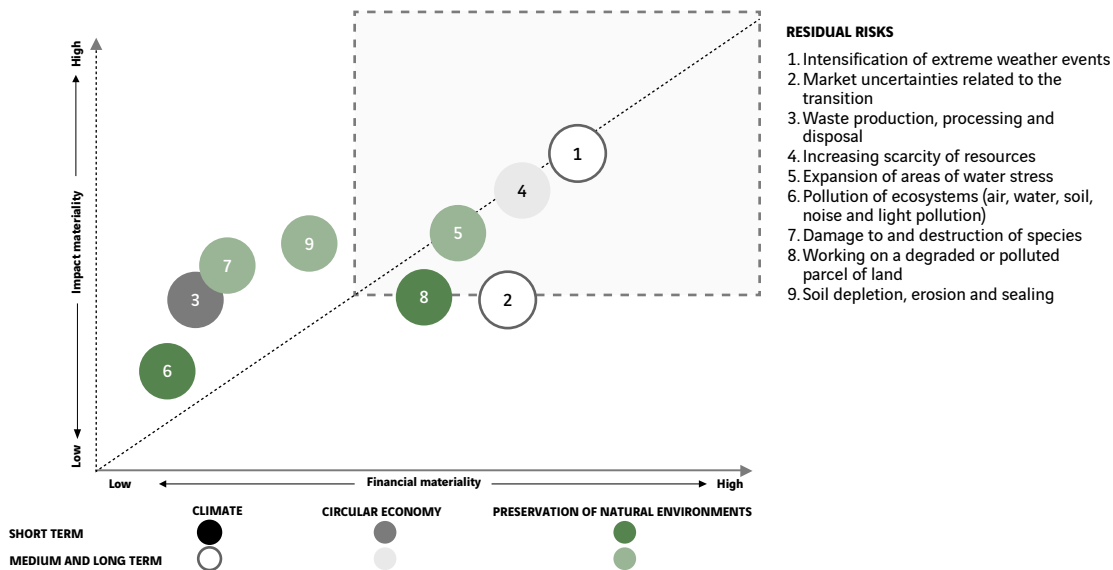
#### b. VINCI’s material issues

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.

To identify the residual risks mapped below, gross risks were assessed according to their severity and probability of occurrence for the Group, which was reduced in proportion to the level of management of the risk. These risks were plotted according to their time horizon:

short-term (less than five years) or medium/long-term (more than five years). Climate risks were assessed from the perspective of two scenarios in Working Group 1’s Fifth Assessment Report of the IPCC: the RCP 2.6 (an “optimistic” scenario with a high probability of limiting the global temperature rise to 2.5°C by the end of the century) and the RCP 4.5 (a “realistic” scenario more likely than not to result in a global temperature rise as high as 3.3°C by the end of the century).



#### Environmental risk map



The dotted rectangle highlights the most significant risks, which are also presented in chapter D, "Risk factors and management procedures", page 179. Most of these risks are medium- and long-term risks. VINCI is working to implement both risk-hedging and business strategies to simultaneously diminish the impact of its activities and reduce financial risk, for risks deemed to be material in the short term (ST), medium term (MT) or long term (LT).

In addition to assessing and mitigating the environmental impacts of its activities, VINCI analyses the opportunities brought to its activities by the challenges of the environmental transition. Technological and market evolutions are enabling VINCI to deliver new environmental solutions to its customers, in every business line. VINCI's research and development efforts are focused on creating low-carbon and energy-efficient products and services.

### Climate-related risks and opportunities

Risk	Description of the net risk	Horizon	Business lines
1. Intensification of extreme weather events  (RCP 4.5 scenario)	<p><b>Physical risk</b> causing damage to installations, equipment and the health or safety of employees during extreme weather events (storms, wide variations in temperature, drought, flooding, rockslides and other ground movements), whose frequency and magnitude are likely to increase with climate change (see paragraph 2.5.1, "Physical risks related to climate change", of chapter D, "Risk factors and management procedures", page 180).</p> <p>This risk was assessed under an RCP 4.5 scenario, using data from a study conducted by the Resalliance engineering and design office on the resilience of Group activities to climate risks. Under a more optimistic scenario (RCP 2.6), the financial materiality of the risk would be lessened.</p> <p>The following procedures are in place to manage this risk:</p> <ul style="list-style-type: none"> <li>- to reduce financial materiality: identifying and adapting high-risk sites and activities to mitigate the risk, using data from research on the resilience of Group activities (see paragraph 3.2.3, "Resilience of projects and structures", of the "Environmental performance" section, page 239, and paragraph 4.4.3, "Tailored actions to mitigate risks and prevent serious impacts," page 278); establishing business continuity plans for certain concession assets and implementing emergency procedures in cooperation with local stakeholders; and obtaining coverage from insurance companies (see paragraph 2.5.1, "Physical risks related to climate change", of chapter D, "Risk factors and management procedures", page 180);</li> <li>- to reduce impact materiality: commitments to reduce greenhouse gas (GHG) emissions, as part of the "Acting for the climate" focus of the Group's environmental ambition (see paragraph 3.1, "Environmental ambition," of the "Environmental performance" section, page 220).</li> </ul>	MT	VINCI Autoroutes VINCI Concessions VINCI Energies VINCI Construction VINCI Immobilier
2. Market uncertainties related to the transition  (RCP 2.6 scenario)	<p><b>Transition risk</b> impacting VINCI's activities in the medium term. The environmental transition has raised many uncertainties about how to interpret market signals. New cap-and-trade programs (markets for rights to pollute, which can affect activities that emit greenhouse gases), the possibility of a carbon tax, and the consequences of the EU Taxonomy on excluded sectors are all sources of risk.</p> <p>This risk was assessed under an RCP 2.6 scenario, which would drive a very rapid transition and a strong societal preference for low-carbon activities. Under the RCP 4.5 scenario, the transition would be more gradual, and the financial materiality of the risk would be lessened.</p> <p>The procedures in place to manage risk in terms of both financial and impact materiality involve the Group's ability to adapt to its markets and effectively track changes in standards (see paragraph 2.2.2, "Legal and regulatory compliance", of chapter D, "Risk factors and management procedures", page 176).</p>	MT	VINCI Autoroutes VINCI Concessions VINCI Energies VINCI Construction VINCI Immobilier
Opportunity	Description of the opportunity	Horizon	Business lines
1. Accelerating energy renovation	A boom in the energy renovation market is expected in the coming years, creating opportunities for VINCI Construction and VINCI Energies, which develop and deliver solutions to improve the energy efficiency of the built environment (see "Environmental transition of buildings" under paragraph 3.2.2.1, "Actions to reduce indirect emissions", of the "Environmental performance" section, page 235). According to the GHG emissions reduction targets published by the European Union in June 2021 (the "Fit for 55" package), 3% of the building stock must be renovated each year (compared to the current rate of 0.2%) to achieve energy savings of at least 60% between 2021 and 2030.	ST	VINCI Energies VINCI Construction
2. Supporting the transition to a low-carbon economy	The GHG emissions reduction targets cannot be achieved without a massive exit from fossil fuels by every industry. VINCI offers solutions to facilitate the transition to other sources or pathways to low-carbon energy, described in paragraph 3.2.2.1, "Actions to reduce indirect emissions", of the "Environmental performance" section, page 235, in the areas of: <ul style="list-style-type: none"> <li>- sustainable mobility;</li> <li>- funding, building, connecting and maintaining renewable energy production facilities (solar PV plants, wind power projects, etc.);</li> <li>- developing low-carbon hydrogen infrastructure.</li> </ul>	MT	VINCI Concessions VINCI Autoroutes VINCI Energies
3. Adapting to climate change	The current infrastructure, built to last between 50 and 100 years, may have to contend with extreme weather events of increasing frequency. In preparation for this, infrastructure modifications (strengthening sea walls, adapting drinking water distribution networks, building rainwater harvesting and wastewater collection systems, creating cool urban spaces, etc.) and maintenance (repair of equipment or electrical lines) is necessary. VINCI offers solutions to make buildings and regions more resilient to climate change. These solutions are presented in paragraph 3.2.3, "Resilience of projects and structures", of the "Environmental performance" section, page 239.	ST	VINCI Construction VINCI Energies

**Circular economy risks and opportunities**

Risk	Description of the net risk	Horizon	Business lines
1. Risks related to waste production, processing and disposal	<p>The production, processing and disposal of waste resulting from the Group's construction activities and those of its suppliers carries the risk of degrading natural environments and may constitute a nuisance for local populations, while contributing to the depletion of certain virgin raw materials.</p> <p>The Group has pledged to reduce these risks by committing to optimise resources thanks to the circular economy by 2030. Risk management procedures are already in place and include the following:</p> <ul style="list-style-type: none"> <li>- waste monitoring incorporated into environmental reporting;</li> <li>- implementing residual waste management plans at worksites and developing solutions to improve the sorting and recovery of waste and the reuse of recycled materials in construction. These actions are presented in paragraphs 3.3.1, "Promoting the use of techniques and materials that economise on natural resources", page 241, and 3.3.2, "Improving waste sorting and recovery", page 242, both in the "Environmental performance" section.</li> </ul>	ST	VINCI Autoroutes VINCI Concessions VINCI Energies VINCI Construction
2. Increasing scarcity of resources	<p>The construction and energy production sectors consume significant quantities of raw materials (sand, wood, aggregates, metal, etc.). Extracting these resources carries the risk of degrading natural environments and reducing a region's resilience to climate change. Sourcing the raw materials needed for the Group's activities may become problematic in the face of increasing resource scarcity.</p> <p>The Group has pledged to reduce this risk by committing to optimise resources thanks to the circular economy by 2030. Risk mitigation strategies involve eco-designed construction, responsible supply chains promoting the use of materials of recycled origin by every division, in particular to reduce the quantity of asphalt mix used for motorway maintenance (see paragraph 3.3.1, "Promoting the use of techniques and materials that economise on natural resources", of the "Environmental performance" section, page 241).</p>	LT	VINCI Autoroutes VINCI Concessions VINCI Energies VINCI Construction VINCI Immobilier

Opportunity	Description of the opportunity	Horizon	Business lines
1. Waste reduction and recycling	<p>In response to the growing scarcity of natural resources, VINCI is already offering its customers a range of solutions to recycle, reuse and recover materials, soil and sediment. These solutions are presented in paragraphs 3.3.1.2, "Solutions designed to promote responsible sourcing and the deployment of sustainable materials", page 242, 3.3.2.2, "Reuse solutions", page 244, and 3.3.3, "Developing recycling solutions", page 244, all in the "Environmental performance" section.</p>	ST	VINCI Construction

**Risks and opportunities in preserving natural environments**

Risk	Description of the net risk	Horizon	Business lines
1. Expansion of areas of water stress	<p>VINCI's activities require water supplied by a distribution network or withdrawn from natural environments. Climate change and disruptions to the water cycle will result in an expansion of areas where water resources can no longer meet demand, whether due to temporary or structural factors. The impact for VINCI's activities in these areas is a lack of available resources to conduct operations or clean equipment.</p> <p>The Group's Autoroutes, Concessions and Construction business lines have committed to reducing their water consumption (see paragraph 3.1, "Environmental ambition", of the "Environmental performance" section, page 220). This risk is managed by identifying project sites in areas of water stress and adapting construction and operation processes and methods. At the same time, the Group is working to optimise water consumption and develop solutions to reuse water (see paragraph 2.5.2, "Increasing scarcity of resources", of chapter D, "Risk factors and management procedures", page 180).</p>	MT	VINCI Autoroutes VINCI Concessions VINCI Energies VINCI Construction
2. Pollution of ecosystems (air, water, soil, noise and light pollution)	<p>VINCI's activities (quarries, worksites, etc.) may release particles into the air, water or soil or cause accidental pollution. They may also be responsible for noise pollution and vibrations, mainly caused by traffic on operated infrastructure, entities' worksites and quarry operations, potentially impacting local residents. In addition, its activities sometimes require lighting that may disturb ecosystems. This light pollution exposes the Group to image and reputation risks that may carry financial consequences.</p> <p>To protect itself from this risk, the Group implements environmental management plans and internal control systems that provide for site audits. The various measures taken are presented in paragraph 3.4.1.1, "Actions to prevent pollution and incidents", of the "Environmental performance" section, page 246, and include phasing out phytosanitary products, covering salt piles on motorways, systems to prevent accidental pollution on motorways, reducing emissions from the use of machinery and vehicles, monitoring air and water quality, measuring noise levels and footprints and installing opaque screens along motorways.</p>	ST	VINCI Autoroutes VINCI Concessions VINCI Construction
3. Damage to and destruction of species	<p>The Group's activities may harm the integrity of plant and animal species for different reasons: habitat fragmentation, alteration or destruction, the use of chemical compounds and the pollution risks described above. The Group is aware of these issues and implements procedures to limit the impact of its activities:</p> <ul style="list-style-type: none"> <li>- reduced use of phytosanitary products;</li> <li>- implementation of environmental management plans;</li> <li>- implementation of specific ecological restoration measures at some worksites once all avoidance and reduction strategies have been applied (see paragraph 4.4.3, "Tailored actions to mitigate risks and prevent serious impacts", page 278).</li> </ul>	ST	VINCI Autoroutes VINCI Concessions VINCI Construction

Risk	Description of the net risk	Horizon	Business lines
4. Working on a degraded or polluted parcel of land	<p>Working on a previously degraded or polluted parcel of land poses a risk for the health and safety conditions for Group employees, a risk of financial impact resulting from increased expenses necessary to remediate sites and from construction delays, and image and reputation risks in the event of deficient quality of service (substandard work).</p> <p>The following procedures are in place to reduce the financial materiality of these risks:</p> <ul style="list-style-type: none"> <li>– prior identification of polluted and degraded land;</li> <li>– coverage obtained from insurance companies;</li> <li>– implementation of the Group's health and safety policy, which protects employees working on land exposed to risks;</li> <li>– use of decontamination techniques and procedures (see paragraph 2.5.3, "Environmental quality and presence of contaminants", of chapter D, "Risk factors and management procedures", page 180).</li> </ul>	ST	VINCI Autoroutes VINCI Concessions VINCI Construction VINCI Energies
5. Soil depletion, erosion, degradation and loss of natural land	<p>The loss of natural land that is inherent to construction and earthworks activities and the extraction of raw materials (mainly from quarries) leads to the degradation of natural environments and causes soil depletion, which decreases the services rendered by ecosystems and promotes erosion. The regulations deriving from France's Climate and Resilience Law and the "no net land take" target for 2050 create a risk for Group revenue in the medium term.</p> <p>However, the Group has incorporated this risk into its strategy. It has set a target of "no net land take" by 2030 for VINCI Immobilier (see paragraph 3.1, "Environmental ambition", of the "Environmental performance" section, page 220) and is developing expertise in the regeneration of industrial brownfields. The risk is also mitigated by the Group's responsible purchasing policy, which favours the use of environmentally sustainable materials, such as certified wood.</p>	MT	VINCI Autoroutes VINCI Immobilier VINCI Construction

Opportunity	Description of the opportunity	Horizon	Business lines
1. Land recycling	<p>The "no net land take" by 2050 target set by France's Climate and Resilience Law to halt urban sprawl has created a need for extensive brownfield regeneration in order to meet urban development demand. Through its many land recycling projects, VINCI Immobilier has brought new life to urban brownfields and empty, obsolete or abandoned buildings, in collaboration with other Group divisions (see paragraph 3.3.3.2, "Land recycling", of the "Environmental performance" section, page 245).</p>	ST	VINCI Autoroutes VINCI Concessions VINCI Energies VINCI Construction VINCI Immobilier
2. Land rehabilitation	<p>VINCI encompasses several companies specialising in ecological engineering, under the Equo Vivo brand. These entities take measures to restore the ecological balance of land and environments affected by construction works, such as planting native species, combating invasive non-native species, restoring wetlands and waterways with diminished ecological functions, building fishways, and levelling weirs (see paragraph 3.4.3.3, "Solutions for preserving biodiversity used by customers", of the "Environmental performance" section, page 253).</p>	MT	VINCI Construction

#### 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 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, "Identifying and managing risks", of the "Environmental performance" section, page 221).

##### ISO 14001 certifications at VINCI in 2022

- VINCI Autoroutes: 100% of kilometres in service
- VINCI Concessions: 83% of revenue (93% for VINCI Airports)
- VINCI Energies: 44% of revenue
- VINCI Construction (excl. Road activities): 87% of revenue
- Road activities of VINCI Construction: 50% of revenue from works activity, 63% from quarries owned, 41% from coating plants owned, 63% 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", of chapter D, "Risk factors and management procedures", page 184).

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 Bionécéssité 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"> <li>- 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)</li> <li>- Inspection of work performed by specialised providers (including environmental performance)</li> <li>- Publicly released assessments of socio-economic and environmental impacts, called "LOTI audits", established by the French domestic transport planning law (Law 82-1153 of 30 December 1982), for new transport connections</li> <li>- Mapping of CSR risks (in progress) per purchasing category (especially subcontracting)</li> </ul>
VINCI Concessions	<ul style="list-style-type: none"> <li>- Environmental and social due diligence for investments and projects under development in order to analyse and manage environmental and social risks at the earliest possible stage of a project</li> <li>- Internal environmental audits for 24 airports with ISO 14001 certification</li> </ul>
VINCI Energies	<ul style="list-style-type: none"> <li>- EcoVadis certification obtained by VINCI Energies in 2022 (Gold in France and Platinum in the Netherlands), recognising the quality of its sustainability management system</li> <li>- Risk assessment and environmental health and safety regulatory watch, centralised on an internal tool designed for VINCI Energies companies</li> <li>- Use of Preventeo by VINCI Energies companies in France to obtain consolidated compliance results and translate nonconformities into measures for inclusion in action plans</li> </ul>
VINCI Construction	<ul style="list-style-type: none"> <li>- EcoVadis certification obtained by VINCI Construction's divisions in France (Gold) and Sogea-Satom and ETF (Silver) in 2022, recognising the quality of their sustainability management systems</li> <li>- Assessment of environmental risks for activities being acquired or for investments in quarries or production plants</li> <li>- Internal assessment of environmental risks for each project using a questionnaire based on local regulations and ISO 14001 (Earthworks, Maritime and River Works delegation)</li> <li>- 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</li> <li>- 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-Satom)</li> <li>- Regulatory compliance audits (57 in France in 2022 for Road France Division entities)</li> <li>- 26 internal compliance audits in 2022 using a set of 115 items to assess worksite performance (Earthworks, Maritime and River Works delegation) and 23 internal audits for the Road France Division, to verify the implementation of environmental action plans</li> <li>- Internal audits of worksites applying for the Attitude Environnement label (Building France Division) or the Excellence Environnement label (Road France Division and Networks France Division)</li> <li>- Audits of subsidiaries and subcontractors, with the requirement for audited subcontractors to provide an environmental risk analysis and environmental protection plan</li> <li>- Assessments of subcontractors, suppliers and partners by works management after service completion, using a dedicated internal tool (Dodin Campenon Bernard and Earthworks, Maritime and River Works delegation)</li> </ul>
VINCI Immobilier	<ul style="list-style-type: none"> <li>- Quality audits carried out systematically at all residential property worksites, for example in compliance with VINCI Immobilier's charter for clean worksites</li> </ul>

**b. Assessing the situation of suppliers**

As indicated in paragraph 2.2.1, "Group-wide approach to promote responsible purchasing", of the "Social performance" section, page 214, 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. The Group or some of its entities may also carry out audits of their suppliers, focusing on specific purchasing categories, often selected because of the associated risks. In 2022, VINCI used this methodology for three tender processes launched for purchases in the strategic categories of temporary employment, worksite equipment leasing and hardware and amounting to annual expenditure of more than €700 million.

For local purchases, special attention is paid to materials suppliers, in particular by asking them to provide information on their environmental footprint, such as their carbon impact 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. In the Building France Division, environmental data modelling tools for construction materials have been developed in collaboration with engineers from the École des Ponts ParisTech to assess the exact environmental footprint, especially the greenhouse gas emissions, of the concrete used in its projects. The aim is to be able to generate data that its teams can use for their life cycle analysis calculations.

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

Business line	Examples of supplier assessment
VINCI Autoroutes	<ul style="list-style-type: none"> <li>- Due diligence during consultations</li> <li>- Supplier audits including sustainability criteria</li> <li>- Supplier assessments during performance, using dedicated internal tools, and sharing of results at meetings</li> <li>- Collaboration with suppliers on environmental issues (such as products used for road maintenance)</li> <li>- Initial and follow-up assessments of selected suppliers in the Cofiroute network (questions incorporating environmental issues)</li> <li>- Assessment of environmental suppliers (providing programme management assistance) in 2020</li> <li>- Consolidation of purchases through framework agreements</li> <li>- Streamlining of the number of purchases and deliveries to lighten the logistics load</li> <li>- Mapping of CSR risks per purchasing category (in progress)</li> </ul>
VINCI Airports	<ul style="list-style-type: none"> <li>- Analysis in progress to identify and assess the main social and environmental risks for each purchasing category</li> </ul>
VINCI Energies	<ul style="list-style-type: none"> <li>- Yearly or half-yearly assessment, using a questionnaire, of each company's top ten suppliers and top five subcontractors, and support of suppliers in their identified areas for improvement</li> <li>- Assessment of VINCI Energies suppliers, using the Actradis platform</li> </ul>
VINCI Construction	<ul style="list-style-type: none"> <li>- In 2022, all suppliers covered by a framework agreement with VINCI Construction's Road France Division and whose contracts are managed by the division's Purchasing Department answered VINCI's ethics and vigilance questionnaire, designed to assess their environmental, social and ethical commitments in particular. The questionnaire was sent to every supplier having participated in a tender in 2022, enabling the identification of the best performers. A total of 99 suppliers, representing a purchasing volume of €185 million, were therefore assessed and/or received guidance in 2022, in connection with the framework agreements managed by the division's Purchasing Department.</li> <li>- Assessment of suppliers, subcontractors and partners upon completion of their service using a dedicated internal tool that includes an environmental evaluation. In 2022, 152 environmental assessments were performed for the Earthworks, Maritime and River Works delegation.</li> <li>- Environmental criteria included in annual assessments of subcontractors and suppliers (Sogea-Satom)</li> </ul>
VINCI Immobilier	<ul style="list-style-type: none"> <li>- Development of "green" specifications for all operations in each sector of activity (residential property, office space, hospitality industry, commercial space, and redevelopment), setting minimum environmental requirements in each focus area (natural environments, the circular economy and the energy/climate)</li> </ul>

### 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 (see paragraph 4.4.1, "Mapping of the Group's major risks", page 273), the Group's environmental ambition for 2030 has been translated into key targets and action plans in three areas: climate change, the circular economy, and the preservation of natural environments. The Group's entities are implementing this ambition by building road maps that are aligned with their business activities and using environmental management systems.

Issue	Commitments
Climate change	<ul style="list-style-type: none"> <li>- Reduce direct greenhouse gas emissions (Scopes 1 and 2) by at least 40% by 2030 compared with 2018 levels</li> <li>- Reduce indirect emissions (Scope 3) by at least 20% between 2019 and 2030, by taking action across the value chain for the Group's businesses</li> <li>- Adapt infrastructure and activities to improve their climate resilience</li> </ul>
Resources and the circular economy	<ul style="list-style-type: none"> <li>- Promote the use of construction techniques and materials that economise on natural resources</li> <li>- Improve waste sorting to implement waste recovery more widely</li> <li>- Expand the offer of recycled materials to limit extraction of virgin materials</li> </ul>
Preservation of natural environments	<ul style="list-style-type: none"> <li>- Prevent pollution and incidents by systematically implementing an environmental management plan in all businesses</li> <li>- Optimise water consumption, especially in areas of water stress</li> <li>- Aim to achieve no net loss of biodiversity</li> </ul>

#### • 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, "Identifying and managing risks", of the "Environmental performance" section, page 221), which also cover their worksites and sites under operation. For example, VINCI Immobilier applies its own worksite charter that enumerates obligations for all companies operating at the worksite, to monitor and reduce nuisances and environmental impacts.

VINCI Construction is taking actions of increasing scale to prevent all types of pollution. It is implementing efficient and innovative methods to prevent pollution in natural environments, ranging from impermeable areas for the refuelling of machinery to new techniques to prevent the discharge of water containing suspended matter into the natural ecosystem. In recent years, thanks to applications such as Ecare and Watch in VINCI Construction divisions in France, more environmental incident monitoring systems have been developed to facilitate the reporting of all incidents, including major ones.

Various business lines, divisions and subsidiaries also develop internal labels to prevent risks specific to their business activities and to recognise worksites that have done an exemplary job in protecting the environment. In 2022, nearly 300 worksites were certified with the Attitude Environnement label and 42 VINCI Construction worksites received the in-house Environmental Excellence label.

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-raising and training initiatives (see paragraph 3.1.3, “Employee training and awareness”, of the “Environmental performance” section, page 225). Regular 15-minute environmental sessions at worksites build awareness among employees and subcontractors alike. In 2022, 72,397 training hours were devoted to environmental issues (51,537 in 2021), an increase of more than 40% in one year.

**• 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 more frequent and more intense extreme weather events each year. According to the 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 shifts that could affect all aspects of 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 2020, VINCI further strengthened the Group’s targets, looking to align itself with the Paris Agreement. The Group therefore pledged to achieve 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”, of the “Environmental performance” section, page 229) and a 20% reduction in its Scope 3 indirect emissions by 2030 compared to the 2019 baseline. These commitments are based on the emissions categories defined in the Greenhouse Gas Protocol (GHG Protocol) and have been validated by the Science Based Targets initiative (SBTi), which makes the Group’s target setting strategy consistent with a reduction “well below” two degrees Celsius. In addition to this absolute value for its emissions reduction target, VINCI seeks to contribute to global carbon neutrality in its direct scope of business activities by 2050.

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, encompassing Scopes 1, 2 and 3.

**13%** reduction in greenhouse gas emissions between 2018 and 2022, 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”, of the “Environmental performance” section, page 229): 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 (VINCI Construction), temperature adjustments in offices and site facilities as well as airport terminals (VINCI Energies, VINCI Concessions, holding companies), 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).

**38%** of electricity used in 2022 was from renewable sources

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 114 buildings in France), in line with the energy efficiency guarantee applied by VINCI Energies to the operation phase. Using eco-design software developed in partnership with the Mines ParisTech engineering school, VINCI Construction teams also offer solutions for predicting and managing the energy consumption of delivered buildings. VINCI Construction companies therefore embed energy efficiency into a building’s entire life cycle. Working proactively to adapt buildings 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. The Group has conducted research on issues including flood prevention, adapting neighbourhoods to heatwaves and managing the urban heat island effect. VINCI’s engineering and design office Resalliance, which is dedicated to increasing the climate resilience of geographies, infrastructure and their uses, has also developed vulnerability maps and actions plans for certain projects on behalf of Group divisions

**• 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”, of the “Environmental performance” section, page 240).

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 ten years ago, VINCI Construction rolled out 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 2022

Given their extensive international operations, VINCI Concessions business lines 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, the Dominican Republic and Serbia. 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", of the "Environmental performance" section, page 246).

A mapping of risks has shown that the Group's activities can cause pollution of various sorts and deteriorate natural environments. Accordingly, the Group takes steps as needed 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 VINCI Construction'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, impermeable areas for refuelling machinery, and other equipment to prevent accidental pollution. To minimise light and noise pollution generated by the operation of infrastructure, acoustic barriers are regularly placed along motorways, and lighting systems may be adapted to direct light only towards areas requiring illumination for the safety of users. During a project's construction phase, Group entities use acoustic enclosures or ventilation strategies to diminish the noise produced by their machines. Depending on the context, noise levels may be measured, and sometimes vibrations as well.

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

Efforts are also made to limit the use of phytosanitary products for road maintenance to the strict minimum. Currently, these products are only used for hard-to-access areas or for fighting invasive plant species. From 2018 to 2022, the use of phytosanitary products (in litres) was reduced by just over 77% in the Concessions business as a whole. As part of its commitments under the act4nature international initiative (see paragraph 3.4.1, "Preventing pollution and incidents", of the "Environmental performance" section, page 246), VINCI has made a pledge to cease all use of phytosanitary products by 2030 (unless prevented by contractual or regulatory provisions).

**41** airports used no synthetic phytosanitary products in 2022

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 reduction strategies have been applied.

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

Since 2019, the Group has published a practical guide on responsible purchasing. It clarifies that the sourcing of innovative solutions to protect the environment, fight climate change and achieve the energy transition is an integral part of the Group's responsible purchasing. At the end of October 2021, 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 2022, 3,500 employees had completed it. A more advanced course for Group purchasing roles was developed in 2021 and completed by 200 employees by the end of December 2022.

In 2022, VINCI mapped social and environmental risks specific to key purchasing categories for the Group's five main divisions in France (VINCI Construction's Road France and Building France divisions, VINCI Energies France, VINCI Autoroutes and VINCI Airports), with the assistance of an external partner. This risk map expands on the environmental risk map established for the Group's activities in 2019, which assessed the materiality of each purchasing category with respect to social and environmental impacts. First, purchasing categories were grouped by type of risk, and then the risks were scored in a team workshop setting. Using this methodology, some 60 purchasing categories were mapped by degree of risk and criticality. Starting in early 2023, workshops will be held to develop corrective action plans. The strategy adopted for each business area may range from carrying out a new analysis of the inherent risks for this category and its supply chain, to further strengthening the sustainability assessments in order to better measure how suppliers will be able to address the risks identified, as well as establishing structured, in-depth dialogue on these issues with suppliers, in order to gain more insights into the supply chain and improve prevention measures in place.

Discussions have been initiated with certain strategic suppliers (for example, for fuel, equipment leasing and concrete) with a view to reducing Scope 3 emissions.

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.

In 2022, 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, VINCI companies specialising in timber-frame construction source a very large majority of their wood (over 80%) from PEFC- or FSC-certified sustainably managed forests. In 2022, VINCI also completed its third CDP Forests assessment and received the score of C, which recognises the Group's awareness of deforestation and forest degradation risks and best practices.

**100%** of framework contracts signed by the Group Purchasing Coordination unit included one or several environmental criteria in 2022

#### 4.4.4 The Group's whistleblowing systems

##### a. Whistleblowing and alert procedures

VINCI has set up a dedicated online solution enabling whistleblowers to report 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.

##### b. Environmental incidents in 2022 and remediation measures taken

In 2022, six environmental incidents involving a VINCI subsidiary or one of its subcontractors were identified. These included cases of pollution requiring the intervention of an external specialist and whose consequences extended beyond the boundaries of the originating entity or worksite. The majority of incidents reported in 2022 were oil leaks from machinery (for example, due to a ruptured hose) and accidental release of pollutants (bentonite and concrete residue). The teams rapidly took the appropriate actions to avoid further spread into the environment and cleaned up the site as needed (evacuation of contaminated soil, installation of containment barriers, soil analysis, etc.). For example, an ETF machine leaked a significant 1,500 litres of hydraulic oil at a rail worksite between Vierzon et Tours. The operators immediately applied absorbent material and removed the contaminated ballast for treatment at a specialised facility. The local authorities and the customer were alerted. A root cause analysis was then conducted and preventive measures introduced for similar machinery used at the site.

#### 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), the recommendations of the Task Force on Climate-related Financial Disclosures (see the cross-reference table, page 401) and the Sustainability Accounting Standards Board framework (see the cross-reference table, page 402). 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. These goals are regularly reviewed by VINCI's Executive Committee and Board of Directors.

**99%** of Group revenue covered by environmental reporting



This universal registration document was filed on 28 February 2023 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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1973, boulevard de la Défense  
CS 10268  
92757 Nanterre Cedex - France  
Tel: +33 1 57 98 61 00  
[www.vinci.com](http://www.vinci.com)

 VINCI.Group

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 @VINCI