

a force
for
good.



DUTY OF VIGILANCE PLAN
EXTRACT FROM THE 2019 VINCI ANNUAL REPORT

4. Duty of vigilance plan

This section of the annual report aims to satisfy the requirements of French law no. 2017-399 on the duty of vigilance of parent companies and subcontracting companies to identify risks and prevent severe impacts on human rights and fundamental freedoms, on people's health and safety and on the environment, resulting from the activities of the company, those of its subsidiaries or those of the subcontractors or suppliers with whom they have an established business relationship.

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

The objective of VINCI's activities is all-round performance, which in addition to economic and financial performance includes attaining social and environmental goals. This is the only possible vision for a regional contributor whose activities and constructions are designed for the long term and have a major impact on local communities. Improving the local living environment is a goal shared by all Group companies, which strive to:

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

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

At 31 December 2019:

1,542 companies, **67%** of which have fewer than **100** employees



222,397 staff worldwide in over **100** countries

75%
Europe
(45% in France)

11%
Americas

7%
Africa

5%
Asia and the
Middle East

2%
Oceania

84%
in OECD
countries

Group entities frequently undertake project-based work. This means that they provide services over variable periods of time (ranging from a few weeks to a few years), for projects of varying sizes and natures. They work with a variety of partners and subcontractors for varying periods of time, involving fluctuating numbers of workers, in changing geographical areas. They are sometimes the subcontracting company and sometimes a subcontractor for customers with diverse sets of requirements and priorities with regard to environmental, employment and social issues. Consequently, each project has its own ecosystem, so any action must be targeted and address operational issues.

Another feature of the construction and concessions businesses is the fact that operations are often highly integrated, meaning that an essential portion of the supply chain operates on VINCI sites. Subcontractors of all levels work alongside the Group's teams at its worksites or sites under operation. The subcontractor supply chain is therefore closely monitored and subject to a shared set of rules. The same applies to workers recruited through temporary employment agencies. Both subcontracting and temporary labour are essential to the Group's business activities, whether in construction or concessions, and account for a significantly high volume of purchases. Accordingly, these two components of the value chain have been included in VINCI's duty of vigilance plan as priority areas for improvement. 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. Gradually, these purchases will also be incorporated into the Group's duty of vigilance plan. In support of this, purchasing governance was reinforced in 2019 (see paragraph 2.2, "Relations with suppliers and subcontractors", page 216).

35%
of purchases are
subcontracting purchases

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

33%
of customers are public
sector organisations

VINCI takes all of these parameters into account in designing and implementing vigilance measures that are relevant and effective with regard to its organisational model, value chain and the specific challenges of each sector.

4.2 Duty of vigilance governance

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

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

• Health and safety governance

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

The Coordination unit is made up of the health and safety directors of the Group's business lines, so that a strong safety culture can be spread and shared by all VINCI companies. Its mission is to build this shared culture, mainly by facilitating best practice sharing and the exchange of feedback, assessing existing procedures, enhancing the reliability of indicators and by suggesting new paths of improvement adapted to each activity. Accident prevention Pivot Clubs and internal collaboration platforms help disseminate and monitor measures throughout the community of health and safety officers, coordinators and experts. These measures are also carried out by a network of more than 2,500 employees working in health and safety roles throughout the Group.

In 2019, one meeting of all the Health and Safety Pivot Club coordinators was held and the Coordination unit met three times. During the unit's meetings, briefings on any significant accidents or events in each business line were given, and human resources needs in health and safety were discussed. The Coordination unit also continued to map major risks and build a skills inventory in health and safety.

The health and safety policy is presented to the Board of Directors' Strategy and CSR Committee each year. In early 2020, each business line presented its health and safety policy and the 2019 results to VINCI's Executive Committee. Health and safety holds a central place in the Group's labour-management dialogue and leads the agenda at every Group Works Council or European Works Council meeting.

• Human rights governance

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

At VINCI, human rights issues are championed at the Group's highest level. In 2019, the Chairman and CEO confirmed the Group's commitment to raise the bar on respect for human rights and embed them in its corporate culture by signing the French version of the CEO Guide to Human Rights, published by the World Business Council for Sustainable Development (WBCSD), along with nine other French top executives.

The human rights policy is coordinated by the Human Resources Department and its director, who is a member of VINCI's Executive Committee, and promoted throughout the Group by a human rights steering committee, comprised of the human resources directors of all business lines and divisions. As VINCI's management is highly decentralised, this committee created in 2015 facilitates decision-making, discussions 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 measures 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 committee meets on a quarterly basis. The teams working on the operational side to ensure the respect of human rights are therefore primarily the Group's human resources professionals, as well as its operational managers, who occupy key roles in the Group's organisation.

Day to day, the human rights policy is coordinated by the Corporate Social Responsibility Department, reporting to the Human Resources Department, which provides support to business lines and divisions in integrating and disseminating Group measures, develops and enhances mapping and assessment tools, conducts assessments, builds awareness among management committees and employees, and communicates with Purchasing, Internal Control, Ethics and Vigilance and other departments. The team is in frequent contact with external stakeholders involved in human rights to address identified issues, answer questions and provide further information about the measures taken in the Group.

In October 2019, the human rights component of the duty of vigilance plan was discussed by the 25 members of the European Works Council and their deputies (see paragraph 4.4, "Duty of vigilance with regard to human rights"). Furthermore, the Group Human Resources Director presents the human rights policy implementation to the Board of Directors' Strategy and CSR Committee each year.

• Environmental governance

Management of VINCI's environmental issues is built on the commitments made by its Executive Committee and expressed in the Group's new environmental ambition. The related goals are supported and coordinated at the Group's highest echelon by the Environment Department.

The Group's Environment Department organises the environmental component of the Group's duty of vigilance plan, based on the shared environmental goals of VINCI's business lines and entities in three areas: climate change, the circular economy and natural environments. The Environment Department leads the environmental committees, whose members are the environmental managers and directors of the Group's business lines, and the environmental network of more than 500 correspondents.

Duty of vigilance measures relating to the environment are cascaded to each entity and followed up locally, in accordance with the Group's decentralised structure, so that the action taken is adapted to local realities. Group initiatives are based on the measures and processes that VINCI companies have already implemented for many years to avoid or reduce the environmental impact of their activity in the countries in which they operate. In this manner, the Group's entities define their own risk prevention procedures for their activities. More specifically, they build environmental policies that align with the Group's new environmental ambition, implement environmental management systems and develop internal environmental standards and labels.

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

The environmental component of the duty of vigilance plan was presented to the European Works Council and discussed by its members in November 2019.

• Overall duty of vigilance governance

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

Implementation of the duty of vigilance plan is regularly reviewed by the Ethics and Vigilance Committee, formed in March 2018. This seven-member committee includes five Executive Committee members and ensures that the compliance procedures covered by the Code of Ethics and Conduct are diffused and amended as necessary. These include procedures relating to the fight against corruption and the prevention of severe impacts on human rights and fundamental freedoms, on people's health and safety and on the environment, resulting from the Group's activities. The committee meets at least once every quarter and met six times in 2019. It reports annually on its activity to the Board of Directors' Strategy and CSR Committee.

4.3 Duty of vigilance with regard to health and safety

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

4.3.1 Mapping of the Group's major risks

• Identification and ranking of VINCI's main issues

In VINCI's sectors, taking 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 has its own risk map specific to its business activities and operational environments. At the operational level, each Group site must conduct a health and safety risk analysis ahead of any work situation, taking into account the geographical context, the characteristics of the work being considered and its technical specificities. These multiple levels of analysis are essential to developing initiatives and responses tailored to the operational issues of each project, activity and country.

In addition, with the assistance of the Institut pour une Culture de Sécurité Industrielle (ICSI), a mapping of major risks at Group level was conducted in 2018. ICSI interviewed the health and safety directors of VINCI business lines and divisions over several months to highlight the major risks inherent to their respective businesses and analyse the documents used to manage these risks and related Group processes. The map revealed the most common major risks shared by the Group's activities. A milestone review is currently under way, with the support of ICSI.

• VINCI's main issues

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

These main categories of risks to people's health and safety are:

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

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

Business lines and divisions develop their own prevention policies that are adapted to their activity, geographical area and operational environment. These policies establish rules that should enable all foreseeable situations to be planned for, but also rely on the ability of individuals and teams to use their experience and training to manage unexpected events. The policies are implemented with varying degrees of decentralisation, so that any situation that arises can be handled as effectively as possible. The established procedures make no distinction between employees of Group companies and temporary or subcontractor staff: all active personnel at any given site work in the same conditions. Annual action plans and specific audit schedules support these policies, which are monitored by line management superiors and the network of health and safety officers. Every business line and division in the Group therefore has a risk prevention policy, an associated action plan, a schedule of audits and a dedicated team of specialists. Safety inspections and audits carried out by safety officers, whether of VINCI's entities and employees or of worksites operated by external companies (whether or not they belong to the Group), are an essential part of this policy.

The Group is also expanding the practice of cross-auditing by health and safety representatives in its various companies. For example, VINCI Autoroutes' internal control programme includes cross-audits among the business line's three companies (ASF, Cofiroute and Escota), conducted by a member of the prevention team in each company. Twelve internal audits, each carried out by regional management and based on a shared set of internal guidelines, are also conducted annually. Using a standard set of criteria, various issues are given a score reflecting their level of management and maturity, and strengths and areas for improvement are identified. Audited issues include

prevention policy and its organisation and coordination; training programmes and initiatives; preparation and organisation of work; management of materials, equipment and products; management of accidental events; medical monitoring of employees; and the management of works and services entrusted to external companies. Each audit concludes with a detailed report of observations made and a plan for corrective actions to be monitored by the relevant regional management.

VINCI Construction's divisions have rolled out robust health and safety systems. VINCI Construction Grands Projets has a dedicated audit team within its Quality, Safety, Environment and Information Systems Department (DQSE-I). Rules have been established that require each project to be audited by VINCI Construction Grands Projets headquarters every two years and also require a dedicated QSE management system and corresponding audit schedule to be set up for every project as soon as it is created. Each year, the VINCI Construction Grands Projets management committee sets the annual audit schedule to be implemented and monitored by the audit team. A notification is sent prior to each audit, along with a detailed, tailored audit plan. Audits are based on applicable standards (ISO 9001, ISO 14001, ISO 45001, etc.) and guidelines applied by VINCI, VINCI Construction and VINCI Construction Grands Projets, as well as special requirements (a safety plan, process map, contract, partner requirements, local standards, etc.) identified from the start due to the project's particularities. ISO 9001, a core standard for audits, covers all aspects relating to the management, selection, monitoring and assessment of subcontractors. It should be noted that audits cover the entire site and, particularly with regard to health and safety, all site personnel (including subcontractors and other staff) without distinction. Upon completion of an audit, observations are shared with project heads and the audit report is sent to all levels of project management, including the general management of VINCI Construction Grands Projets. Once the audit report is received, the entity suggests actions to remedy any issues. Project managers and the audit team share responsibility for monitoring the action plan: in general, the project's QSE manager informs the auditor when measures are implemented and provides evidence of achievements. Periodic progress reports on achievements and trends are also made. The audit team keeps track of all these measures and supporting documents in a regularly updated dashboard. In 2019, 29 audits were performed, including internal audits at headquarters, amounting to 58 audit days. At 31 December 2019, more than 85% of the corrective actions taken in 2018 had been completed.

85%
of actions completed
following 2018 health and
safety audits by VINCI
Construction Grands Projets

Audit procedures relating to health and safety at Group entities also involve obtaining certifications. The standards in question often require their own audits, which may be conducted by external auditors. Such audits involve every business line and division. Similarly, at their own level, projects, sites under operation and worksites implement risk management systems and, therefore, tools to monitor the management of health and safety risks. These systems draw on the results of the risk analysis performed and regularly updated for every Group site, to address issues specific to the worksite or site under operation. All these different levels of risk monitoring and assessment reinforce and complement each other.

Health and safety audit procedures in VINCI business lines

- Health and safety policy, procedure, internal audit schedules and dedicated department for every VINCI business line
- Health and safety audits conducted on worksites and sites under operation by health and safety officers at different levels of the organisation (more than 2,500 employees in health and safety roles) and by teams from Group departments
- Expanded cross-auditing practices among companies
- Continuous certification process under way in the Group (ISO 45001, MASE, OHSAS 18001, etc.)
- Close involvement of company managers in audit outcomes and improvement actions to be taken
- Inclusion of all site personnel (VINCI employees, temporary workers, subcontractors, etc.) in safety audits on worksites and sites under operation

4.3.3 Tailored actions to mitigate risks or prevent serious impacts

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

a. Actions developed and implemented at Group level

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

The Group's health and safety policy, which is covered in its Code of Ethics and Conduct and VINCI's Manifesto, was reinforced in 2017 by the signature of a joint declaration by the Chairman and CEO of VINCI and the Secretary of the European Works Council. The statement sets a standard for the Group by identifying essential and fundamental occupational health and safety initiatives. It is currently available in 21 languages and can be accessed by the public on VINCI's website (www.vinci.com/vinci.nsf/en/item/essential-and-fundamental-actions-concerning-occupational-health-and-safety.htm). The declaration is the product of steady, constructive dialogue between management and labour and contributes to a continuous improvement process that should engage all employees to promote a safety culture at VINCI. Its broad dissemination is evidence of its visibility and the level of engagement at the highest echelon of the Group's management. Furthermore, the short-term variable remuneration of VINCI's Chairman and CEO is linked to environmental, social and governance (ESG) criteria, including occupational health and safety indicators.

• Essential and fundamental occupational health and safety actions

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

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

Employee representatives must be involved in the implementation of initiatives, notably in the prevention of workplace accidents and occupational hazards, and must be consulted for suggestions. Safety awareness and training, to ensure that all workers understand the risks, are essential to promoting occupational health and safety. The training must be provided to employees during their work hours; more specifically, employees must be given instructions and explanations relating to their job or assignment. They must be familiar with operating procedures and safety regulations and comply with them. Materials and tools must be used as intended, and personal protection equipment must be worn correctly.

1,542

meetings of health, safety and working conditions committees in 2019

These rules apply to everyone at VINCI, in all activities, in all companies and in all countries where the Group operates.

• Risk prevention for subcontractors and temporary employment agencies

Across the Group, VINCI's Subcontractor Relations Guidelines (www.vinci.com/vinci.nsf/en/item/subcontractor-relations-guidelines.htm) underscore the Group's determination to ensure that the employees of its partner companies work under the same safety conditions as those of its own staff. Disseminated by the regional Pivot Clubs, where the regional managers of the Group's businesses meet regularly and exchange ideas, the guidelines are a tool for Group entities to use in their relations with subcontractors. At VINCI Construction France, a two-day safety training session and assessment is also offered to temporary workers to enable them to obtain a safety passport called Pasi. The passport demonstrates acquisition of the safety fundamentals that temporary workers must understand before they start working at a worksite. Initially created by VINCI Construction France, after it was observed that accidents were more frequent among temporary than permanent staff, the Pasi is now used throughout the industry. The initiative reflects a firm commitment to protect employees and partners alike, in particular by implementing a robust prevention policy. With the Pasi's more widespread use, the training offer has been expanded beyond the Cesame centres of Construction France by providing a shared set of specifications to training providers. As a result, the number and geographic coverage of the safety fundamentals sessions has significantly increased. Many VINCI companies have also signed framework contracts with their subcontractors. The zero accidents objective is the common denominator in these contracts, which include special clauses covering essential measures such as wearing personal protective equipment, reporting workplace accidents and providing ongoing information on any changes in worksite hazards.

In addition, workforce-related and social criteria have been incorporated into the framework contracts signed by the Group with approved temporary employment agencies. These criteria require that the agency demonstrate a strong track record in people's health and safety and a safety culture in the workplace. The latest selection of approved temporary employment agencies in France went into effect on 1 January 2016, for a four-year period. It is compulsory for Group entities to use approved agencies for their temporary recruitments. In 2019, a process was initiated to renew the contracts with the approved agencies. Negotiations began and an action plan to improve quality of service and safety, specific to each company, was added to the procedure. The improvement plans are based on an analysis of the results of the previous phase, especially the health and safety aspects, and contain specific measures to increase the safety of temporary staff, along with indicators to track safety goals. These measures include, for example, surveys of temporary staff, feedback on prevention initiatives, awareness-raising and training events conducted by the company and improved registration of workers' safety documents (ID card, Pasi, etc.). Subject to the outcome of the negotiations, framework contracts with the agencies will be renewed for three years.

47

temporary employment agencies excluded based on ESG criteria during the latest selection process

• Innovation Awards

Every three years, VINCI presents the Innovation Awards. The competition aims to accelerate the spread of local initiatives by its operational employees. The awards distinguish not only technological achievements but also innovations that promote the Group's continuous improvement, notably in the areas of safety, sustainable development and working conditions. One of the award categories recognises innovations for the health and safety of employees, partners and/or customers. For the latest Innovation Awards in 2017, more than 2,000 applications were submitted by more than 5,000 employees, and nearly 150 innovations were distinguished around the world, of which 28% were related to people's health and safety. The selection of judges and the organisation of ceremonies give visibility to the event and show all employees that the topic is an important one for the Group's management. Furthermore, highlighting in-house achievements in occupational health and safety innovation is a reminder to all of the need for constant vigilance, commitment and improvement in this area.

b. Actions adapted by the Group's business lines and divisions

• Guidelines specific to the Group's various activities

Business lines and divisions define guidelines and/or golden rules specific to their activities and take action in their companies, close to the employees who will implement them. Each entity has multiple sources of guidelines – the Group, the business line, the division, the entity itself, and so on. These guidelines reinforce and complement each other to provide a tailored response to the situation of each sector and activity. Audits and prevention measures take into account all these rules and guidelines.

• Negotiation of collective agreements on health and safety issues

Labour-management dialogue takes place at every level of the company. As part of its health and safety policy, VINCI negotiates and enters into specific agreements with trade unions and employee representatives on subjects related to improving staff working conditions, thereby enhancing the overall performance of Group companies. In 2019, 29 health, safety & prevention agreements were signed by Group companies.

• Continuous, tailored awareness and training initiatives for employees and managers

Each activity has its own toolbox of measures that are tailored to its own situation and integrates health and safety awareness into its daily routines, such as pre-start and pre-task briefings and 15-minute safety sessions. Initiatives such as these have been rolled out by most activities and offer daily opportunities to review basic safety rules, explain operating procedures, introduce the work environment and engage employees. Many awareness raising and training sessions focus on issues specific to each activity, such as working at height, driving vehicles or hand injury risks. Innovation is also central to these training efforts, in order to continuously improve their effectiveness and adapt them to changing activities.

In addition to on-site training for employees, most of the Group's activities have developed training programmes for executives to strengthen the safety culture among managers. At VINCI Construction, the "Managing with Safety" programme launched in May 2017 has already reached more than 3,700 managers in the target group of 8,000 managers worldwide. It promotes five essential actions, the first of which is to assess the safety culture of managers prior to their annual performance review. The programme addresses the organisational and human factors in accident prevention. Its aim is to help company executives develop a just culture and improve prevention through a better understanding of root causes. Similar training initiatives were developed in other business lines, such as Eurovia's programme entitled "Managing Health & Safety at Eurovia". Worksite visits take place regularly in all Group entities. In addition, a variety of materials are published and events held to make the management's commitment to safety known and visible to all. Meetings of management include health and safety issues on their agenda.

36%

of training hours in 2019
devoted to health and safety

At Group level, ICSI's Safety Academy training resources were added to the VINCI Up! e-learning platform, which makes specialised training modules available to employees at all times.

• Organisation of international health and safety events

Promoting a shared safety culture in the company and in relations with stakeholders is an important driver for developing everyone's skills, motivation and creative potential. For this reason, international health and safety events are regularly organised by the various business lines and divisions, such as International Safety Week, held each year since 2014 by VINCI Construction for its 70,000 employees, or International Prevention Day. VINCI companies continue to involve more and more temporary staff and subcontractors, as well as customers, in safety training and awareness. These events reflect the management's commitment to each activity. Many VINCI subsidiaries organise in-house competitions to reward health and safety initiatives, such as the HSE Challenge at Entrepose and Soletanche Freyssinet (VINCI Construction) and the Security Challenge by VINCI Concessions.

• Health and safety perception surveys

Surveys of employees' perception of the health and safety culture in their company are becoming more common in various parts of the world. They provide specific, objective evaluations of the effectiveness of health and safety policies and help to encourage dialogue in companies for the development of improvement plans.

30,000

employees answered a
perception survey on the
health and safety environment
at Eurovia

• Health and safety certification initiatives

Group companies are stepping up certification efforts in the area of health and safety. Their aim is to promote the continuous analysis of each procedure through a series of audits and thereby improve their performance. These efforts include OHSAS 18001 certification for the optimisation of occupational health and safety management; LSC-VCA-SCC or Mase-UIC certifications; and certification processes for ISO 45001, the new international standard for occupational health and safety. It calls for periodic in-house audits by trained and specialised employees, as well as external audits conducted by competent bodies. A growing number of companies are gradually starting the process to obtain ISO 45001 certification.

Health and safety certifications at VINCI in 2019

- VINCI Construction: 53% of revenue certified OHSAS 18001 and 16.8% of revenue certified ISO 45001
- VINCI Energies: 50% of revenue certified OHSAS 18001
- Eurovia: 46% of revenue from the works activity certified OHSAS 18001
- VINCI Autoroutes: Cofiroute obtained ISO 45001 in April 2019, ASF began the process with the aim of obtaining certification in 2020 and Escota will begin the process in 2020

4.3.4 Alert mechanisms and processing of reports

The joint declaration signed in 2017 by Xavier Huillard and the European Works Council emphasises that any situation observed by employees that represents an imminent threat to health and safety must be immediately reported to the employer or relevant superior. No employee can be reprimanded for making such a report. Likewise, depending on the operational context, employees can avail themselves of procedures such as exercising the right to refuse work, if they believe the situation presents a serious and imminent danger to their life or health.

Managers are strongly encouraged to raise alerts and report hazards. Business lines and divisions have developed dedicated tools to facilitate, streamline and process these reports. An application called "Move Safe" was launched in May 2019 for all VINCI Autoroutes entities. It enables any employee to electronically report a dangerous situation or near miss. The number of reports doubled through use of the application, compared to paper reporting. VINCI Construction and VINCI Energies have developed similar applications for reporting hazardous situations, called Watch and Safety Up, respectively, and made them available to employees. The Watch application for smartphones is intended for use as an additional prevention tool to enhance the effectiveness of accident prevention policies. It has been observed that when hazardous worksite situations are identified, reported and corrected, the risk of an accident caused by that situation is diminished. Since Watch was launched in August 2015, more than 20,000 situations have been reported due to safety, quality or environmental issues. Among the reported safety issues, 53% were hazardous situations, 15% were near misses and 32% were best practices. For each division, the most frequently occurring situations are analysed to identify corrective actions to be taken. The application was inspired directly by Group company initiatives that received the VINCI Innovation Award. In the interests of transparency and encouraging dialogue, the Health, Safety and Working Conditions Committees were consulted prior to rollout of the application.

4.3.5 Monitoring of the implementation and effectiveness of measures

• Health and safety monitoring indicators

Local processes to identify and manage risks are measured and reviewed on a regular basis and information is communicated to the Group. The outcomes of initiatives are measured by relevant indicators, which are presented to the management committees of the business lines and divisions, providing the opportunity to discuss how to improve them. At VINCI Autoroutes, the management committee examines key indicators every two weeks. At Group level, in addition to presentations to VINCI's Executive Management, presentations are made to the Board of Directors' Strategy and CSR Committee, Remuneration Committee and Appointments and Corporate Governance Committee, in order to evaluate managers' performance, and to the Board of Directors itself.

72%
of Group companies had
no lost-time workplace
accidents in 2019

Safety data on temporary staff and subcontractors is increasingly included in health and safety performance monitoring indicators.

Lost-time workplace accident frequency rate, worldwide:

- VINCI employees^(*): 5.90 in 2019 (6.10 in 2018 and 7.51 in 2014)
- Temporary staff: 16.24 in 2019 (15.03 in 2018 and 23.02 in 2014)
- Lost-time workplace accident severity rate (VINCI employees) (*): 0.38 in 2019 (0.42 in 2018 and 0.49 in 2014)
- Percentage of Group companies with no lost-time workplace accidents in 2019: 72% (72% in 2018 and 69% in 2014)

Definitions

Lost-time workplace accident frequency rate = (number of lost-time workplace accidents ÷ 1,000,000)/number of hours worked.

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

(*) These indicators were verified with a reasonable level of assurance.

The gap between the workplace accident frequency rates of VINCI employees and temporary staff reflects differences in the jobs performed, in safety awareness, and in technical know-how and experience. Reports on workplace accidents involving temporary staff enable VINCI companies to take concrete steps to prevent them from recurring.

This data is verified by independent third-party bodies. 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.

• **Specific monitoring for potentially severe events and alert procedure for fatal accidents**

The health and safety of all employees and workers is an absolute priority for VINCI. Every accident is methodically and thoroughly investigated and analysed, and the findings are shared with the employee representatives. Pursuant to an agreement with the VINCI European Works Council, a quarterly report is submitted to the Council Board on workplace accidents, commuting accidents and occupational illnesses. Business lines and divisions monitor events with potentially severe consequences in a particular manner. Events found to meet this description during their analysis are consolidated, compared and studied from a macroscopic perspective in order to identify underlying risks, root causes and trends. This helps to develop both curative and preventive measures, by making it possible to anticipate the potential occurrence of a severe accident. Severe accidents are presented to management committees once the root cause analysis has been carried out.

When a fatal accident occurs or the victim of an accident has suffered a life-threatening injury, VINCI's management must be informed. This is done in addition to the internal procedures in place for the relevant Group company, business line and division. A written procedure, validated by VINCI's Human Resources Director, is applied by all business lines and the Health and Safety Coordination unit. The procedure provides for the notification within 24 hours of any fatal accident involving a VINCI company, whatever the cause or the type of relationship – direct or indirect, contractual or not – between the victim and the Group. A full report is then made in the presence of, in particular, the Chairman and CEO of VINCI, the Human Resources Director, the head of Health and Safety Coordination and the business line's director and accident prevention director. 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. 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.

4.4 Duty of vigilance with regard to human rights

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

4.4.1 Mapping of the Group's major risks

• **Identification of VINCI's main issues**

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

Main international standards and conventions underlying VINCI's approach

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

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

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

• VINCI's main issues

The critical analysis of all of these sources led to the identification of five main issues, broken down into 17 specific themes. They span VINCI activities that can have a significant impact on human rights, including those of employees, subcontractors, temporary staff, local residents and local communities. These five areas cover the entire project life cycle, from the response to the call for tenders to the preparation of sites and construction, until the commissioning and operational phases. This work led to the publication of VINCI's Guide on Human Rights, which is a public document available to all on the VINCI website (www.vinci.com/vinci.nsf/en/item/guide-on-Human-rights.htm). Following the release of this guide, the relevance of the key issues it identifies was confirmed by various Group entities and validated by feedback from operational teams in different countries.

The five main issues and 17 themes are:

Main issues	Description	Themes
1. Labour migration and recruitment practices	In the course of their activities, VINCI companies may recruit migrant workers, whether directly or through temporary employment agencies. The situation of these migrant workers can reflect a range of scenarios, depending on the conditions of their migration (travel, administration, recruitment, accommodation, etc.). Due to varying recruitment practices and national legislation on migration, specific risks of breaching the rights of migrant workers might arise.	1. Recruitment fees and debts 2. Contract substitution 3. Work permit, ID, visa, passport, and exit permit
2. Working conditions	This issue relates to potential breaches of fundamental employment rights that could result from a lack of vigilance concerning working conditions, such as wages and their payment, number of hours worked, paid holidays and employment benefits, and restrictions to freedom of association. Given the nature of the Group's activities, employee health and safety is a separate important issue, which has been specifically addressed by the Group and its various entities for many years now.	4. Wage levels 5. Working hours 6. Paid holidays and other benefits 7. Workers representation 8. Hiring underage workers 9. Discrimination 10. Health and safety 11. Worksite security
3. Living conditions	In some situations, employers may supply accommodation to workers, due to the size, location or mobile nature of the project or worksite. 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 the living and working conditions of subcontractor employees or temporary staff on sites. VINCI considers that the challenges it faces are identical to those faced by its subcontractors, particularly in the area of health and safety.	14. Raise awareness, identify risks and enter into contractual agreements
5. Local communities	Construction and infrastructure operation projects can impact local communities. Customers, concession holders and construction companies all share responsibilities, varying from one project to another, and must work in close collaboration to identify, avoid or mitigate each project's potentially negative impact on local communities.	15. Socio-environmental issues 16. Land-related issues 17. Community dialogue, engagement, and remediation mechanisms

• Country-specific analysis and prioritisation of issues

Although the Group has identified the main issues for all of its activities and defined a common baseline of minimum requirements for each theme, applied to all activities in all countries, it also believes that the national context is fundamental in assessing the relevance of these issues and themes in a given environment and prioritising them. For this reason, VINCI develops human rights risk maps to identify priorities and help local entities to better understand and manage their environment and find the right response to local issues. All 17 themes identified by the Group are analysed for the given country, using the information in reports from public administrations, international organisations, non-governmental organisations (NGOs), academics, trade unions, the media, and so on. The analysis offers a more precise picture of the specific risks inherent to each country and sector of activity as perceived and reported by a set of relevant third parties. It includes information on the legal and institutional framework surrounding the various aspects covered and reiterates the Group's human rights guidelines. The analysis is an important tool that is used in the assessment of each subsidiary's situation and in setting priorities. It is also an essential resource for raising the awareness of Group employees and teams in relation to risks requiring increased vigilance in a given country, including those faced when entering into contractual relationships or partnerships.

This approach is being deployed progressively, and target countries are chosen based on a combination of recognised international indicators established by international organisations, NGOs or trade union organisations^(*) and of internal indicators of the extent of the local presence of VINCI companies (workforce and revenue). Priority is given to countries where VINCI's presence is strong and/or human rights are deemed to be at risk. The ranking is reviewed each year, to take into account project-based activities of VINCI companies, which can increase or decrease their geographical presence or their level of activity. If needed, other countries may be prioritised to better identify potential issues when preparing a response to a call for tenders. An initial analysis is subsequently fine-tuned based on new research, feedback from operational teams and reported alerts.

^(*) World Bank 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; International Labour Organisation (ILO) – Eight fundamental conventions; Freedom House – Freedom in the World index; International Trade Union Confederation (ITUC) – Global Rights Index.

Country-specific analysis of human rights risks

- 19 country-specific human rights risk maps developed with the assistance of an external provider, of which 10 completed in 2019 (Peru, Mexico, Thailand, Serbia, the Czech Republic, etc.)
- 23% of the employees covered by these risk maps outside of France
- 14 human rights country fact sheets or analyses produced in 2019 by the CSR Department, including those to support responses to calls for tenders

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

• Assessing the situation of subsidiaries

The Group has also developed a performance assessment tool based on the Group's five main issues and 17 themes, along with the corresponding guidelines. All documents produced are therefore based on the same elements: the country's risk map and the assessment tool. For each of the 17 themes, the tool presents a series of precise questions to determine whether the management systems in place conform to Group guidelines and whether they adequately manage and prevent the risks specifically identified in the country's risk map. This approach offers an in-depth, qualitative analysis of the performance of an entity or a project. Based on its results, entities are then in charge of building a plan of action or improvement and reporting on it to the division's Human Resources Department, which in turn informs the Group through its steering committee representative. As necessary, the Group will specifically monitor major risks. Where applicable, the tool is also used to varying degrees to analyse major projects, whether during the tender process or once the project is under way. Sometimes, on their own initiative, entities will approach the Group for guidance, to ensure that the action they are taking is sufficient to prevent a risk.

With regard to internal control, the Group may initiate unannounced verifications of compliance with the rules set out in its reference documents, as a complement to the controls put in place by business lines and divisions.

• Assessing the situation of subcontractors and suppliers

The Group has provided all entities with a due diligence methodology in five steps: mapping of human rights risks for subcontractors, use of specific criteria during selection procedures, inclusion of specific clauses in contracts, control of these contractual requirements, and the implementation of monitoring procedures. Other verifications and audits are carried out on a case-by-case basis. In Qatar, the subsidiary QDVC set up a robust assessment and monitoring process for subcontractors many years ago, which includes audits of documentation as well as interviews with management and with workers. Over the 2018-2019 period, QDVC conducted 49 audits focusing on human rights and working conditions and 208 audits looking at the living conditions provided by subcontractors and labour suppliers. To further these efforts, the Group is also implementing new pilot projects on methodologies to analyse and prevent social risks in subcontracting. These projects aim to assess social risk management practices already in place, identify improvement areas and construct an operational method to evaluate, prioritise and manage risks (see page 242, "Risk prevention for subcontractors and temporary employment agencies").

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audits of the working and living conditions for QDVC's subcontractors in 2018-2019

For the Group's key categories of purchases such as temporary labour, the Group's Purchasing Coordination unit has set up framework contracts with selected suppliers. Invitations to tender and specifications integrate social and environmental criteria. Depending on the purchasing category, these criteria may include the environmental impact of the suppliers' products and services, the conditions in which they are produced (including health and safety aspects), the suppliers' societal commitments, and so on. Supplier assessment is therefore tailored to the purchasing category and to issues specific to the sector. Based on how they perform against the criteria, some suppliers are eliminated, while for others, a CSR improvement plan is proposed, with the aim to promote collective upskilling. The contracts provide for the possibility of audits, and each year a review is conducted with approved suppliers.

• Audits by third parties

In some cases, audits or other external controls have been set up by the Group and/or its subsidiaries. This is the case in Qatar, where a framework agreement was signed in November 2017 by VINCI, its subsidiary QDVC, and Building and Wood Workers' International (BWI). It provides for an extensive system involving monitoring, reporting, checks, inspections and audits 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 employment rights of workers. It applies to all workers employed by QDVC in Qatar and stipulates a due diligence procedure for subcontractors. An audit was conducted on 8 and 9 January 2019, during which representatives of the three signatories were present, including BWI's auditors and VINCI's trade union representatives. It covered every point in the agreement, and the auditors also had the opportunity to observe the election of Workers' Welfare Committee members at the end of a two-year term. The final audit report was issued jointly and can be accessed by the public on VINCI's website (www.vinci.com/publi/vinci/2019-01-BWI-QDVC-VINCI-Joint-Audit-Report-En.pdf).

In 2018, with regard to its airport activities in Cambodia, 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. In 2019, the application of the NCP's recommendations, finalised in December 2018, as well as those from the independent psychosocial risks audit, were specifically monitored by Cambodia Airports, VINCI Airports and VINCI. Measures implemented in 2019 included increasing the workforce, reinforcing medical follow-up for selected categories of staff and replacing aging equipment to facilitate certain tasks and reduce the associated physical strain. Likewise, audits of the three main temporary employment partners were performed and the results are being monitored by the Cambodia Airports teams. In December 2019, a progress report was made to the NCP on the implementation of its recommendations.

4.4.3 Tailored actions to mitigate risks or prevent serious impacts

a. Actions implemented at Group level

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

• Guidelines addressing the main issues and applicable across the Group

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

For each of the 17 themes identified by VINCI, specific guidelines have been developed. They translate each of the human rights issues identified by the Group into operational terms and make practical recommendations for operational teams, all countries and activities combined.

Excerpt from the Group's guidelines

"In the course of the work conducted to identify the Group's main issues, it was revealed that labour migration combined with poor recruitment practices and a restrictive legal environment created a risk with regard to which the Group and its entities must be particularly vigilant. One of the key aspects of this issue, and an identified risk factor, is debt bondage. Accordingly, to provide practical assistance to operational teams on how to prevent this risk, the following guidelines were established:

- no fees are to be charged to candidates at any stage of the selection, recruitment and hiring process;
 - all contracts signed with recruitment agencies must include a "no fees" policy; recruitment agencies must be transparent to end-user companies with regard to their practices, in particular the use of agents or subagents, and their costs and terms of engagement;
 - the company and its recruitment agencies must ensure that candidates are made aware that no fees should be charged at any stage of the recruitment process;
 - confidential channels for reporting complaints about fees must be made available to migrant workers.
- When assessing the situation of subsidiaries, the Group is especially vigilant about this issue."

The development and circulation of these guidelines also reflect VINCI's efforts to anticipate risk factors as early as possible and provide suitable responses to prevent abuses. For each of the 17 themes identified by the Group, guidelines of this sort have been developed.

VINCI's Guide on Human Rights was widely distributed among the Group's operational entities and was presented to the management committees of the Group's business lines and divisions. Continuous efforts are made to build awareness in management committees through similar initiatives. In 2019, the CSR team attended more than 40 meetings of management committees, HR boards and regional and thematic Pivot Clubs to maintain and increase awareness among executives and managers. According to the 2019 survey of VINCI's internal control, 83% of entities, all business lines and divisions combined, had communicated about the Guide and its guidelines to their employees at end-September 2019, an increase of 12 points over the previous year. For the majority of the remaining entities, a plan of action is under way to do the same. To facilitate the adoption and dissemination of the guidelines, the guide, which primarily targets VINCI employees, was translated into 22 languages, thereby covering more than 98% of the Group's workforce, based on the official languages of the countries where the Group operates. External stakeholders can also access the guide on VINCI's website.

83%
of entities in VINCI's
internal control survey
communicated to employees
on VINCI's Guide on Human
Rights

As a result of these considerable efforts to raise in-house awareness, certain business lines and divisions have incorporated the guidelines directly into their internal rules or procedures. For example, in 2019, VINCI Construction Grands Projets added a human rights alerts mechanism to its internal procedures manuals for key project processes such as recruitment. Internal standards for living conditions, which are based on the Group's guidelines but adapted to the division's business activities, were also reviewed and validated, as in other Group divisions. The human rights component of the division's tendering manual was significantly reinforced to improve the early understanding and management of risks by teams in charge of preparing responses to calls for tenders.

Lastly, some issues such as wage levels, working hours, paid holidays, workers' representation, discrimination, and hiring underage workers are first assessed through the human resources rules and procedures applied by companies and projects, which thereby form a first level of risk prevention. Likewise, site safety rules enhance risk prevention in the Group's activities as well as at the various levels of subcontracting at the sites that are under Group companies' control.

• Risk management and prevention with regard to temporary employment agencies

In VINCI's sectors, whether contracting or concessions, the major challenges are at the operational level. Accordingly, when it comes to vigilance with regard to human rights risks in the value chain, the subcontractor and temporary employment agency workers on sites are a priority. Because temporary labour is a significant purchase category, the Group's Purchasing Coordination unit set up a framework contract to use with temporary employment 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. The latest selection of approved temporary employment agencies went into effect on 1 January 2016, for a four-year period. It is compulsory for Group entities to use approved agencies for their temporary recruitments. During the selection process, 47 agencies were excluded based on non-financial criteria and 90 were selected after rolling out improvement plans. In 2019, a process was initiated to renew the contracts with the approved agencies. Negotiations began and all companies approached were sent a questionnaire on ethics and duty of vigilance, which also addressed human rights. An action plan to improve quality of service and safety, containing additional measures to increase the safety of temporary staff, specific to each company, was added to the procedure. Subject to the outcome of the negotiations, framework contracts with the agencies will be renewed for three years (see paragraph 4.3, "Duty of vigilance with regard to health and safety").

• Awareness and training initiatives

The Group considers that in matters of human rights, managers play a decisive role. It places emphasis on awareness and training initiatives that target managers and other employees and reflect their on-the-ground realities. The objective is to develop a prevention culture in this area, similar to what has been achieved in safety and security, and to provide operational teams with the means of acting as early as possible. The Group considers it essential to train employees in these issues so that they are able to identify problematic risk situations and understand how to prevent them. As a complement to the face-to-face presentations and training sessions regularly held in France and abroad, an e-learning module to raise awareness of human rights risks was launched in February 2019, culminating a year of collaborative development. It is available to all entities and employees on the Group's e-learning portal. Managers and people in charge of human resources, administration, finance and quality, and health and safety have been identified as priority target groups for this training. The human rights steering committee monitors completion of the e-learning module at regular intervals.

In addition, several of the Group's core, emblematic training programmes now include a human rights module. One example is the Team Grands Projets training programme implemented across the Contracting business lines. The addition of the human rights module was validated after a trial period in 2019. Teams Grand Projets addresses site managers, technical directors, works directors, equipment managers and administrative and financial directors. Its objective is to bolster the skills of people in charge of major projects and help them manage increasingly complex environments using a risk approach. The CAP HR programme, specific to VINCI Construction Grands Projets, is another example. It presents the division's human resources policy to all managers, whatever their project or country of work. The human rights module is now an integral part of the programme.

• European Works Council involvement

The 25 members of the European Works Council (EWC) and their deputies discussed the human rights component of the duty of vigilance plan during the EWC training session held in mid-October 2019. The Group's Human Resources Director, Director of Employment Affairs and the Director of Corporate Social Responsibility attended the event to facilitate discussion about the duty of vigilance plan and initiatives taken by the Group. The general secretary of the Entreprises Pour les Droits de l'Homme / Businesses for Human Rights (EDH) non-profit was also invited to present the duty of vigilance law, the organisation's expectations and the results of its analysis of the duty of vigilance plans published in 2018 and 2019. The Group will pursue this dialogue in 2020.

• Active participation in collaborative initiatives

The issues facing VINCI and its entities are often complex and involve multiple players throughout the value chain. Although VINCI continually enhances its risk prevention and management systems, it does not always have the influence necessary to pursue every possible action, due to its position in the value chain and the cyclical nature of its activities. In addition, the highly decentralised and cyclical nature of the Group's activities can make it difficult, in some contexts, to implement an approval process for partners in the sector. For this reason, as a complement to its in-house efforts, VINCI has joined a number of external networks and initiatives in order to work collaboratively with other stakeholders on tools, methodologies and initiatives to promote the respect of human rights and, in particular, to help develop ethical labour sourcing in certain parts of the world.

Main collaborative initiatives in which VINCI participates

- **Building Responsibly**, of which VINCI is a founding member. Launched in February 2017, Building Responsibly brings together engineering and construction firms in order to develop common approaches and standards, share best practices, tools and experiences, and engage stakeholders and all actors in the value chain to find concrete and collective solutions to the challenges faced by the sector. Following the June 2018 publication of the Workers' Welfare Principles, the result of extensive work by its members and diverse stakeholders (research institutes, NGOs, companies, industry initiatives, the ILO, professional organisations, among others), Building Responsibly developed Guidance Notes to help the industry understand each principle. Its members also pursued discussions with various players (non-profit, professional and institutional organisations) to determine how to incorporate these principles into business relationships. This is an essential step towards effectively addressing challenges while providing a level playing field. Four new firms joined the initiative this year and increased efforts are being made to further recruit industry players.
- **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.
- **Entreprises pour les droits de l'Homme** / Businesses for Human Rights, of which VINCI is an executive board member. This association of 16 leading French companies is a forum for discussion, initiatives and proposals by these businesses to promote improved integration of human rights into business policies and practices.
- **Global Compact**

b. Actions adapted to local contexts

This section presents two significant initiatives that were implemented and followed up by the Group and its companies in 2019 to prevent risks or promote human rights. They illustrate the complementary nature of VINCI's approach, which combines general guidelines, promoted and disseminated by the Group, with tailored solutions obtained by adapting the guidelines to local challenges.

• Prevention of social risks in subcontracting in France

The issues faced by VINCI are not limited to regions outside of France: tensions in the building and civil engineering markets and increased competition and labour flows in Europe have led the Group to strengthen its duty of vigilance approach, in particular with regard to social risks along the supply chain in France. In 2018, VINCI launched pilot projects to identify more precisely the risks faced by its personnel, assess the effectiveness of measures in place to manage social risks and to determine areas for improvement.

The civil engineering and building businesses of VINCI Construction France in the Greater Paris area were the first to participate in the pilot projects. Their work was carried out in three phases:

- diagnosis and mapping of social risks in subcontracting based on purchasing category;
- diagnosis of the effectiveness of existing risk prevention measures;
- development of an action plan using the most effective risk reduction levers and including enhanced vigilance measures for the categories with the highest risks.

The awareness and involvement of managers at all levels of the organisation, from head office to worksites (including functional directors, regional directors, business unit heads, works managers, works supervisors, team leaders, etc.) and in the main support functions (such as human resources, legal, purchasing and risk prevention) was ensured. A steering committee was formed at the top management level of VINCI Construction France, headed by the General Secretary, the Human Resources Director, the Technical and Operational Resources Director, and the Purchasing Director. In all, several hundred people contributed their input to the diagnoses to provide the most complete picture, as true as possible to on-the-ground realities.

In addition to these fundamental steps to enhance the effectiveness of prevention initiatives, a process was begun in 2019 to conduct social audits in subcontracting. Since social compliance auditing is a new concept for the industry in France, specific tools and assessment criteria adapted to the building and civil engineering sector had to be developed before implementing the social audits to be conducted by external auditors and monitored by the Group. The audit procedure was therefore adapted to worksites of different types (major project, launch phase, finalisation phase, joint venture, etc.). For these audits, added focus is placed on issues related to employment contracts, payment of wages, fulfilment of employer's obligations and compliance with working time and health and safety requirements. These audits were positively perceived by worksite teams and enabled the collection of feedback to fine-tune prevention initiatives and, if required, update the risk map and the selection of approved partner companies.

The pilot projects will be extended to VINCI Immobilier and VINCI Energies business units, and VINCI Construction France will expand its social risk prevention initiative to include all its activities. The management of VINCI Construction France has given each entity the goal of setting out a responsible subcontracting policy in 2020, based on a set of centrally defined and reaffirmed fundamentals. The policy will be adapted to the realities of the entity's business activity and its region's socio-economic situation and will be updated using the same approach. Training was delivered to a team of four in each regional division (the chief legal officer, the human resources director and the chief purchasing officer, possibly assisted by the quality director) to help the entity achieve its goal. An operational toolkit was developed and made available. It includes fact sheets, presentation materials, and tools for risk mapping and implementing VINCI Construction France's guidelines. The action plans that are developed must include the core measures of VINCI Construction France, such as creating a roles and responsibilities table and assessing the corporate social responsibility performance of subcontractors.

• Prevention of human rights risks in Qatar

VINCI is present in Qatar via its joint venture QDVC. For a number of years, the company has sought to ensure better working and living conditions for its employees and fights against all infringements of fundamental human rights. In 2015, among other steps taken to verify that measures put in place by QDVC were effective, VINCI decided to enlist the services of an independent third party to conduct a human rights impact assessment (HRIA) at the company. In November 2017, following several years of constructive dialogue, VINCI, QDVC and Building and Wood Workers' International (BWI) signed a framework agreement on workers' rights at the ILO's headquarters, during a ceremony attended by its CEO. The agreement, accessible by the public on VINCI's website, covers human rights in the workplace, accommodation, and issues relating to the fair recruitment and the employment rights of workers. It applies to all workers employed by QDVC in Qatar and stipulates a due diligence procedure for subcontractors. The agreement is the first of its kind in Qatar between a union federation and a Qatari company. It provides for an extensive system involving monitoring, reporting, checks, inspections and audits under the aegis of a reference group composed of representatives of the three parties. In January 2019, BWI conducted the first audit, accompanied by French trade union representatives. The joint report, published in March 2019, confirmed QDVC's fair recruitment practices, continued high standards for health and safety on sites and continued measures to protect and respect workers' rights.

January 2019

BWI-VINCI-QDVC joint audit available online

In March 2019, a press visit was held and included a tour of QDVC's worksites and the workers' accommodation. The latest report by Business and Human Rights Resource Centre (BHRRC), an NGO, published in 2019, ranks VINCI/QDVC first in its benchmarking of Gulf companies, based on its transparency regarding recruitment practices, remuneration, living conditions, freedom of movement, health and safety, workers' representation, measures to mitigate risks relating to subcontracting and consultation and grievance mechanisms (www.business-humanrights.org/sites/default/files/BHRRC-Shaky-Ground-Construction-Briefing-v1.1.pdf and www.business-humanrights.org/en/vinciqdvc-2018).

• Preventing risks relating to recruitment practices

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

QDVC is pursuing its efforts and seeking to spread its ethical recruitment practices to its subcontractors and placement agencies, in particular through a public-private partnership signed in May 2018 with the ILO Project Office in Qatar, as part of a pilot project between the ILO Project Office and the State of Qatar. It is aimed at developing a migration corridor between Qatar and Bangladesh with no recruitment fees for workers. The main components of the project are an initial audit performed in July 2018 by the NGO Vérité, followed by a capacity-building programme for both recruitment and placement agencies in the countries of origin. The programme, which was delivered in 2018 and 2019, brings together QDVC, recruitment and placement agencies in Bangladesh and Qatar, the ILO, Qatar's Ministry of Administrative Development, Labour and Social Affairs (ADLSA), and the Fair Hiring Initiative. In May 2019, an on-site visit was conducted in Dhaka to monitor recruitment, following corrective action taken during the capacity-building programme. An impact study is under way at Tufts University, mainly based on interviews with workers.

QDVC also participated in a study at the New York University Stern Center on the economic benefits of ethical recruitment. Based on the quantitative and qualitative information provided by QDVC, the report published in 2019 concluded that the ethical recruitment of migrant workers could be achieved at a cost of less than 1% of the overall cost of the project and that it contributed to other benefits such as enhanced retention, stronger loyalty to QDVC and higher satisfaction rates among migrant workers.

• Reinforcing employee representation

QDVC took steps early on to provide employee representation and encourage and strengthen labour-management dialogue in the company. A workers' committee was formed as of 2011 and has gradually expanded its powers and scope over the years. It now discusses issues such as working conditions, wages, living conditions and health and safety. In November 2016, QDVC held an election for employee representatives, the first ever in Qatar. The company communicated extensively on the process and the committee leading up to the event. A new workers' committee election took place in January 2019, with an increased participation rate of 84%. Representatives from BWI, French trade unions and VINCI were able to observe the election process during their joint audit, and a video recording of the election was published on the BWI website. In accordance with the terms of the 2017 framework agreement, BWI provided training to the newly elected employee representatives in Doha in 2018, with support from QDVC and VINCI. Training was delivered again in 2019, to the members of the new committee, and extended to some of QDVC's subcontractors' employees. Also in 2019, QDVC formed a committee of representatives of administrative staff, which met for the first time in November.

84%

participation in the election of employee representatives in Qatar

• Improving working conditions

Other measures were introduced or maintained to improve workers' living and working conditions. The workers' accommodation sites managed by QDVC align with standards set by the Qatar Foundation. In partnership with Eutelmed, QDVC also created an innovative psychosocial risk prevention programme that gives employees access to individual or group sessions with a psychologist and an emergency hotline. Confidentiality is ensured. QDVC's employees have been trained to provide psychological first aid in a crisis event and recognise signs of post-traumatic stress disorder (PTSD). With respect to its subcontractors and placement agencies, QDVC has been conducting scheduled audits and occasional assessments for several years. Over the 2018-2019 period, QDVC performed 49 audits focusing on human rights and working conditions and 208 audits looking at living conditions.

4.4.4 Alert mechanisms and processing of reports

Multiple and diverse procedures exist by which employees can report concerns. These grievance procedures include contacting human resources departments, health and safety representatives, line management superiors or employee representative bodies. If confidentiality is a concern, employees can also approach the ethics officers of the Group's business lines and divisions or at Group level. In many countries, employees also have the right to refuse to work in a situation of serious and imminent danger. In addition to these resources, since 2018, VINCI has reinforced its whistleblowing system to take into account recent legislative changes and also created a new Ethics and Vigilance Department, reporting directly to the Executive Management (see paragraph 4.6, "The Group's system for whistleblowing, alerts and the processing of reports", page 257).

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

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

Although VINCI entities may act as clients, very often they are also the subcontractor or service provider for clients in the public or private sectors. In these situations, Group entities are encouraged to participate in the processes put in place by their clients.

4.4.5 Monitoring of the implementation and effectiveness of measures

To complement the information in this section describing the measures that have been implemented, quantitative data is provided here. The Group's initiatives are reaching a growing number of workers, in more and more countries, and at more levels. Measures are implemented in all subsidiaries operating in the same country in order to facilitate dialogue among the businesses and promote consistency.

Human rights assessments in the Group^(*)

- 57 Group subsidiaries in 23 countries assessed since 2018
- More than 12,500 employees in the Group covered by human rights assessments conducted in 2018 and 2019, amounting to 11% of the Group's workforce outside of France and 23% of its workforce in non-OECD member countries
- 35% of the workforce in high-priority countries (as identified by the Group by comparing recognised international indicators and VINCI's presence) covered by human rights assessments conducted to date

^(*) The 2019 action plan was based on data at 31 December 2018.

Some business lines and divisions have also created indicators to monitor the deployment of human rights initiatives and assess their impact. For example, VINCI Construction Grands Projets developed indicators using the results of project assessments performed by a dedicated officer. The indicators are monitored and presented monthly to the management committee. They measure audits and their follow-up, as well as trends in results and corrective actions. Currently, priority is given to projects located in the countries with the highest risk, according to the VINCI risk map, which takes into account eight international indicators (see paragraph 4.4.1). To date, VINCI Construction Grands Projets has conducted human rights audits on 14 projects or subsidiaries in nine countries. If an action plan is in place, it is regularly monitored with the aim of continuous improvement, and follow-up inspections are made.

Lastly, VINCI's annual internal control survey was revised in 2019 to reinforce the portion devoted to the prevention of human rights risks. 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. Questions about the dissemination of the Group's framework publications and resources and about risk prevention measures when working with subcontractors or temporary employment agencies were developed in more detail. Survey findings are presented to the Group's Board of Directors. In addition to serving as a monitoring tool, they build awareness and help the Group refine and guide its future initiatives.

4.5 Duty of vigilance with regard to the environment

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

With regard to the environment, measures to identify and prevent risks are closely tied to the operational context of companies, their activities in the region and the vulnerability of the surrounding area. Group-level environmental initiatives are presented in this document and translated into operational steps that reflect these specific characteristics.

VINCI's duty of vigilance approach and measures taken are adapted to Group policy with the aim of continuous improvement. VINCI's decentralised management model encourages companies to make their own commitments, tailored to their activities and geographies.

4.5.1 Mapping of the Group's major risks

a. Identification of VINCI's main issues

Since 2017, the Group has used risk mapping to identify the major environmental issues resulting from its activities. For this task, it collaborates with an outside provider to ensure that the mapping is thorough and the methodology is valid. The map will be updated on a regular basis. Based on a detailed analysis of operational activities, the risk map established in 2018 provides a structured assessment of the environmental risks that could result from the activity of VINCI companies. The environmental managers of VINCI companies collaborated with the initiative in the following manner:

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

In 2019, the risk mapping exercise was continued in more detail to identify, among the Group's main businesses sorted into 15 categories, the operational activities and environmental aspects at the origin of the Group's main risks as presented by the risk map. A business-based analysis makes it possible to adapt and round out action plans addressing the specific operational risks identified.

The Group's Environment Department coordinated the work, with the input of the environmental managers and operational directors of the relevant businesses.

Risk mapping is complemented by the identification of other types of risk, such as geographical aspects or the effects relating to joint ventures (by business lines). In addition, environmental issues will continue to be taken into account in purchasing processes in 2020.

b. VINCI's main issues

The major environmental issues on which the activities of VINCI companies may have a significant impact were sorted into three areas for action. They span the entire project life cycle, from the response to the call for tenders to the preparation of sites and construction, through to the operation phase. They also involve subcontractors and suppliers.

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

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

a. Assessing the situation of subsidiaries and subcontractors

Multiple environmental assessment processes are in place to fulfil regulatory requirements, meet stakeholder expectations and comply with internal company policies.

• Environmental certification

Implementing an effective, ISO 14001-certified environmental management system is the most common environmental assessment process implemented 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 stands between 50% and 100% of business line revenue (or other relevant indicator), and coverage is increasing each year (see paragraph 3.1.1.2, "Turning risk management into opportunity", page 222).

• Third-party controls

The activity of the Group and its subcontractors is also 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, 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.

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.

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

Business line	Examples of internal controls
VINCI Autoroutes	<ul style="list-style-type: none"> - Inspection of measures to protect wildlife around motorways and supervision and monitoring agreements with many local and national organisations, such as the Bird Protection League (LPO) - Inspection of work performed by specialised providers (including environmental performance) - Publicly released assessments of socio-economic and environmental impacts, called "LOTI audits", established by the French domestic transport planning law (Law no. 82-1153 of 30 December 1982), for new transport connections
VINCI Airports	<ul style="list-style-type: none"> - Environmental due diligence for projects under development in order to analyse and manage environmental risks at the earliest possible stage of a project
VINCI Energies	<ul style="list-style-type: none"> - Risk assessment and environmental health and safety regulatory watch, centralised on an internal tool designed for VINCI Energies companies
Eurovia	<ul style="list-style-type: none"> - Internal audit of worksites applying for the Environmental Excellence label - Internal quality audits including an environmental component - Regulatory watch developed using a tool specific to Eurovia's businesses
VINCI Construction	<ul style="list-style-type: none"> - Internal audit of worksites applying for the Attitude Environnement label (VINCI Construction France) - Internal assessment of environmental risks for each project using a questionnaire based on local regulations and ISO 14001 (VINCI Construction Terrassement) - Assessment of subcontractors, suppliers and partners after completion of their work using a dedicated internal tool (VINCI Construction Terrassement and Dodin Campenon Bernard)

b. Assessing the situation of suppliers

As indicated in section 2.2.3, "Taking social and environmental criteria into account in the Group's purchases", page 218, a process to evaluate suppliers and subcontractors was defined and disseminated by the Group Purchasing Coordination unit for the following environmental risks: depletion of resources, climate change, loss of biodiversity and pollution. The Responsible Purchasing Committee has provided a sample checklist for risk assessment for each purchasing category. Based on these assessments, a supplier may be excluded from a tender process or an action plan may be proposed, together with measures to verify its implementation. For Group purchases, a questionnaire on responsible purchasing is included in the tender process. In addition, responsible purchasing audits of Group suppliers have been conducted by some companies for the past six years.

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

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

Business line	Examples of supplier assessment
VINCI Autoroutes	<ul style="list-style-type: none"> - Due diligence during consultations - Assessment of suppliers while the service is being provided, using dedicated internal tools - Auditing of suppliers
VINCI Airports	<ul style="list-style-type: none"> - Preparation of environmental clauses to be included in contracts with third parties
VINCI Energies	<ul style="list-style-type: none"> - Assessment of suppliers using the Ecovadis platform - Assessment of suppliers using a dedicated internal tool at Actemium
Eurovia	<ul style="list-style-type: none"> - Annual assessment of equipment suppliers - Specific criteria developed for suppliers of raw materials (plastics, etc.)
VINCI Construction	<ul style="list-style-type: none"> - Assessment of suppliers, subcontractors and partners upon completion of their service using a dedicated internal tool that includes an environmental evaluation (VINCI Construction Terrassement and Dodin Campenon Bernard): in 2019, 289 environmental assessments were performed for VINCI Construction Terrassement out of a total of 335 suppliers, subcontractors and partners

4.5.3 Tailored actions to mitigate risks or prevent serious impacts

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

To address the major issues identified for VINCI's business activities, the Group's environmental ambition for 2030 has been translated into key targets and action plans in three areas: climate change, the circular economy and protection of natural environments.

Areas	Objectives and actions
Climate change	<ul style="list-style-type: none"> - Reduce the direct impact of the Group's activities, with a first milestone for 2030 being a 40% reduction of direct greenhouse gas emissions (scope 1 and 2) in absolute terms (like-for-like, excluding acquisitions, but including organic growth) - Strive to diminish the indirect footprint of its activities by reducing Scope 3 emissions within the sphere of influence of its activities - Incorporate the notion of resilience into its practices and solutions to facilitate adaptation to climate change
Circular economy	<ul style="list-style-type: none"> - Reduce the extraction and use of virgin raw materials in favour of recycled materials - Promote the use of construction materials and techniques that use natural resources reasonably - Improve waste sorting, recycling and reuse
Natural environments	<ul style="list-style-type: none"> - Assess and avoid environmental nuisances and incidents in VINCI's business activities - Reduce water consumption, especially in water-stressed regions - Initiate measures to reach the "zero net loss" of biodiversity target

Locally, environmental management systems support risk prevention measures in Group entities (see section 3.1.1.2, "Turning risk management into opportunity", page 222). To complement these systems, the majority of which are ISO 14001 certified, VINCI's business lines, divisions and subsidiaries participate in initiatives and develop labels to prevent risks that are specific to their activity. By 2019, 18 of Eurovia's worksites had obtained its in-house label Environmental Excellence, based on five criteria: protection of soil and water resources, the fight against climate change, waste management, recycling and reuse, biodiversity conservation and responsiveness to local residents' needs.

Business lines also conduct awareness-raising and training initiatives. Awareness is built among employees and subcontractors alike during 15-minute environmental sessions at worksites. In 2019, 42,055 training hours were devoted to environmental issues, a 14% increase over the previous year.

• Mitigating and adapting to climate change

To address climate change, action plans are implemented to reduce the Group's direct greenhouse gas emissions. Some measures are being implemented by all Group companies: gradual increase of electric power for the light vehicle fleet, training in eco-driving practices, modernisation of site machinery and heavy vehicle fleets and the increased use of electricity from renewable sources. Others are being implemented by specific businesses. They include the replacement of heavy fuel oil by natural gas in industrial processes (Eurovia), the use of warm-mix and cold-mix asphalts (Eurovia), regulation of temperature in buildings and terminals (VINCI Energies, VINCI Concessions), testing the use of biogas fuels for some utility vehicles (VINCI Autoroutes), improved energy efficiency of worksite facilities (VINCI Construction), and the production of solar power for self-consumption, with 4.7 MWp already installed in the Dominican Republic (VINCI Airports).

28%
reduction in CO₂ intensity in
2019 compared with 2009

Ensuring the energy efficiency of buildings under construction or renovation is an important objective for the Group. The companies of VINCI Construction are able to meet the requirements of labels and certificates setting the highest standards in the building industry, going beyond compliance with current regulations. They are able to make commitments with regard to the actual energy performance of buildings (through the Oxygen® label, attributed to 80 buildings in France), which is consistent with the energy efficiency guarantee by VINCI Energies applying to the operation phase. Thanks in particular to eco-design software developed in partnership with the Mines ParisTech engineering school, VINCI Construction teams also offer solutions for planning and managing the energy consumption of buildings delivered. These companies therefore predict energy consumption throughout the building's life cycle.

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

• **Raw material conservation and waste reduction, recycling and reuse**

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

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

Nearly **19%**
of recycled asphalt mix in
Eurovia's total production in
2019

To meet its goal of sending zero waste to landfills, VINCI Airports has built on-site sorting centres for its airports in Brazil and the Dominican Republic. To support the initiative, a programme was introduced to raise the awareness of users, employees and subcontractors on waste reduction and sorting.

• **Protecting natural environments**

Protecting natural environments is a key concern for VINCI companies. From the earliest design stage of projects, 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.

Retention ponds are created on the sites of VINCI Autoroutes and Eurovia infrastructure to allow suspended solids in run-off and pumped water to settle and avoid polluting neighbouring watercourses receiving the discharge. The water is only discharged once 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.

In addition, to reduce light and sound pollution from the operation of infrastructure, opaque screens are regularly placed along motorways, and adapted lighting systems (light directed only towards the ground) may be installed.

Efforts are also made to limit the use of phytosanitary products for road maintenance to the strict minimum. They are currently reserved for hard-to-access areas or fighting invasive species, and their use has been reduced to one-ninth of the level in 2008.

The VINCI Group leverages internal and external expertise in ecological engineering to offset residual impacts on species. Specific ecological restoration measures are taken as a last resort, after all means of adaptation have been attempted.

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

The additional mapping of environmental issues, sorted by business, that was conducted in 2019 identified which purchasing categories are most associated with environmental risks. These categories include materials and energy purchases, whose early environmental impact is high (depletion of natural resources or a high carbon impact during manufacturing). Other categories also present significant environmental risks, depending on the business.

In 2019, the Group produced and disseminated a practical guide to responsible purchasing. It states that the sourcing of innovative solutions to protect the environment, fight climate change and achieve energy transition is an integral part of the Group's responsible purchasing. Locally, environmental clauses are also included in the supplier contracts signed with some business lines, divisions and subsidiaries. All of the framework agreements signed between VINCI Energies and its European suppliers or subcontractors include environmental clauses. For VINCI Autoroutes, all contracts for the provision of programme management services by ASF include one or more environmental clauses. In addition, all large contracts for works (greater than €500,000) or intellectual services require suppliers to provide a full environmental impact statement. Some VINCI Construction contracts with suppliers contain environmental requirements and recommendations, in particular regarding low-carbon concrete. At VINCI Construction Terrassement, standard subcontracting contracts also contain environmental clauses.

100%
of framework contracts
signed by Purchasing
Coordination included one
or several environmental
criteria in 2019

4.5.4 Group alert mechanisms and processing of reports

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

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

• Eole incident

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

VINCI Construction conducted a full environmental diagnosis and suggested restoration and offsetting measures for the site. The diagnosis showed that a volume of 2 cubic metres of materials had impacted 25 square metres at the bottom of the quayside. The spillage was of grey water contaminated with sand and traces of deactivated cement.

At the end of 2019, the following restoration and offsetting measures had been implemented:

- Restoration by the removal of 1.75 cubic metres of sand deposited at the bottom of the quayside
- Offsetting by the creation of a lithophilic spawning bed covering 25 square metres upstream of the site.

Other supportive measures are under way, such as treating the site for Japanese knotweed, an invasive species found on the embankment to the right, and creating an aquatic plant-type spawning bed on the right bank of the river at Île Fleurie.

Following the incident, the analysis of risks based on business, carried out for the duty of vigilance plan, was a valuable complement to existing analyses. As a result, action plans could be tailored more specifically to each business.

4.5.5 Monitoring of the implementation and effectiveness of measures

Monitoring of these measures and the assessment of their effectiveness is supervised by VINCI's Environment Department, together with the Internal Control, Ethics and Vigilance, and Purchasing departments. The work is performed on a continuous basis, thanks to the coordination of internal committees focusing on the Group's main environmental issues (the Environment Committee, the Biodiversity Task Force, and the Circular Economy Group). 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 and provides a framework for evaluating corporate sustainable development policy. The annual 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.

96%
of Group revenue covered
by environmental reporting
in 2019

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

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

• A procedure available to all stakeholders

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

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

• A procedure addressing all areas of concern

Whistleblowing in the work context may involve the following areas:

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

- **A multimodal procedure**

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

Initially, employees inform their direct or indirect supervisor, or an officer designated for this purpose within the entity to which they belong. They may then use their entity's specific whistleblowing system, if it has one. Employees can also contact the Group's Ethics Officer directly or use VINCI Integrity, the Group's intranet whistleblowing system, set up at the end of 2018 after receiving the go-ahead from the European Works Council. VINCI guarantees that no employee of the Group will be penalised or dismissed, and that no disciplinary action will be taken against the employee, whether directly or indirectly, for having reported or given evidence, in good faith, under the whistleblowing procedure, concerning acts of which the employee obtained personal knowledge during the course of his or her duties. This remains the case even if the allegation made is determined to be false after investigation. Similarly, the identity of the accused person is treated with the utmost confidentiality.

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

These mechanisms ensure a secure and reliable method of reporting.



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