

# Policy Summary Supply Chain

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



### Company Approach

1.1 EUROVIA UK Limited is a provider of Construction and Infrastructure services in the UK and together with our joint venture partners has a combined turnover more than £700 million.

1.2 EUROVIA UK Limited respects the United Nations Global Compact and adheres to the ten principles covering Human rights, Employment regulations and Anti-corruption. We work collaboratively with our Supply Chain and adhere to our core values.

All EUROVIA UK Limited companies share a mutual code of ethics and conduct; the code is delivered by the Chief Executive Officer. Principles of the code of ethics and conduct are reflected within our vision of developing our modern slavery statement.

EUROVIA UK Limited takes its responsibility to avoid and mitigate any modern slavery in its operations extremely seriously. To that end we have developed a detailed policy and strategy that runs over 3 years to support this statement. Our approach to modern slavery shall be governed by our main board, who shall provide leadership from the top down, continually striving for best practice and leading by example. Our modern slavery policy will be communicated to our supply chain, embedded into our procurement policy and will become a part of the way we work.

### Our People

We have in place several key policies which explicitly state how we operate as a business and the steps taken to ensure that we are a transparent, accessible and inclusive organisation. These policies are reviewed regularly and updated to ensure that ongoing opportunities for improvement are identified and acted upon. These policies include:

- Code of Ethics and Conduct
- Corporate Social Responsibility
- Anti-Bribery
- VINCI Manifesto
- Equality
- Recruitment and Selection
- Whistleblowing

We carry out Right to Work and Pre-Employment checks on all employees joining our organisation and this includes the employee being able to provide evidence that they are in possession of their own identification documents and that the bank account details provided belong to the employee and not a third party. Any discrepancies identified are investigated thoroughly and appropriate action taken.

We have internal procedures accessible to employees for them to highlight any concerns they may have. All reports received are treated seriously and are dealt with in line with the process outlined within the Whistleblowing section of the staff handbook.



**Signed:**  
Scott Wardrop  
Chief Executive

**Issue:**  
May 2017

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In respect of our contingent labour and resource processes, we operate a robust system, working with a consistent number of recruitment agency partners, to fulfil our contingent workforce requirements. We have in place annual reviews with the recruitment agency partners.

## Supply Chain

We have a robust approach to supply chain management and understand that it is critical to the success of our modern slavery strategy and policy to engage with, support and develop our supply chain in this regard.

In developing our strategy and policy in relation to modern slavery, EUROVIA UK Limited has taken the following steps:

1. Created and contribute to a Modern Slavery Working Group, with members from different disciplines and various parts of the UK businesses.
2. Started recording information relating to modern slavery during the prequalification process in eSource.
3. Communicated its policy and statement to internal employees.
4. Communicated its policy and statement to its supply chain.
5. Added additional language to its standard contractual terms with its suppliers and sub-contractors in relation to modern slavery.

Our policy and 3-year modern slavery strategy have been developed by the dedicated Modern Slavery Working Group. As a group, we work closely with the Supply Chain Sustainability School and work cooperatively with our peers to identify modern slavery risk within our supply chains as part of this process.

As is detailed in our 3 year strategy, some of the key actions we will look to deliver in year 1 are to: -

1. Increase the level of detail in relation to modern slavery within our pre-qualification process.
2. Introduce guidance for approvers to ensure poor responses are appropriately managed.
3. Identify risk areas within our supply chain.
4. Develop appropriate training and guidance information.
5. Deliver training to suppliers that fall within high risk categories.
6. Deliver training to all direct employees.
7. Further develop our standard contractual terms to enhance obligations in relation to modern slavery.
8. Join the United Nations Global Compact
9. Produce a supplier code of conduct
10. Produce an Ethical Procurement Policy

We will report on the success of the above actions in our 2018 statement as well as set the objectives for the following year.

This statement is made in accordance with Section 54 (1) of the UK Modern Slavery Act 2015 and constitutes EUROVIA UK Limited's Modern Slavery Statement for the financial year end 31st December 2016.



**Signed:**  
Scott Wardrop  
Chief Executive

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