



# MODERN SLAVERY STATEMENT

## Company Approach

VINCI Construction Holding Limited is part of the VINCI Group, a global player in concessions and construction. We design, finance, build and operate infrastructure and facilities that help improve daily life and mobility for all.

VINCI Construction Holding Limited, to which this statement applies, is made up of 5 key delegations, all operating in the built environment. These are Eurovia, Ringway, VINCI Building, Taylor Woodrow and VINCI Facilities.

VINCI Construction Holding Limited has strong relationships with other VINCI companies and subsidiaries and as a result, can leverage ideas, skills and entrepreneurial flair to deliver high-quality work across all sectors.

All group companies share a mutual code of ethics and conduct, the code is delivered by the Chief Executive of VINCI UK. Principles of the code of ethics and conduct are reflected in our vision and development of our modern slavery statement.

The VINCI Group continue to be a contributing member of the UN Global Compact and takes its responsibility to avoid and mitigate any modern slavery in its operations extremely seriously.

Our approach to modern slavery is governed by our main board, who provide leadership from the top down, continually striving for best practice and leading by example.

Our modern slavery statement is communicated to our supply chain, embedded into our sustainable procurement policy, and has become part of the way we work.

## Our People

We have in place a number of key policies and documents which explicitly state how we operate as a business in relation to people and the steps taken to ensure that we are a transparent, accessible and inclusive organisation. These policies and documents are reviewed annually and updated to ensure that ongoing opportunities for improvement are identified and acted upon.

These policies include

- VINCI Manifesto
- Code of Ethics and Conduct
- Sustainable Procurement
- Social Value
- Anti-Bribery
- Fairness, Inclusion and Respect
- Recruitment and Selection
- Human Rights

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.

As well as internal procedures for direct employees to highlight any concerns they may have, we also provide a confidential reporting service, Safecall, which is available for employees, members of our supply chain and members of the general public. This is a service operated by an independent third party, and is available 24 hours per day, 7 days per week.

In respect of our contingent labour and resource processes, we operate a robust system, working with a consistent number of recruitment agency partners, supported by our managed service provider. We have in place annual reviews and update our contracts with the recruitment agency partners. Each partner and every single temporary worker that have been engaged within our business is audited to ensure compliance with our internal process, expectations and the contract requirements.

## Modern Slavery and ISO 20400

To continue to develop our approach to sustainable procurement and Modern Slavery we are continuing to align our procurement processes to the ISO 20400 guidance standard. As part of this alignment, we have introduced a sustainable procurement plan which sets out our priorities and objectives in relation to Natural (Environment), Human (Economic) and Social capitals.

Human Rights and Modern Slavery fall under the Social Capital priority and the objective is to ensure that high risk sector supply chain partners are engaged in Modern Slavery due diligence activity, providing VINCI with an opportunity to increase transparency and mitigate risk within the supply chain.

We have established a working group with representation from each Delegation and our support services. The working group has undertaken heatmapping exercises to help us understand the risk against each one of our sustainable procurement objectives, including Modern Slavery, and what measures we need to have in place to mitigate against them.

We continually work to improve our procurement process against the ISO 20400 guidance standard and will be seeking our third independent audit in 2026 to verify our performance.

## Supply Chain and Business Engagement

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

We have also worked as part of the Supply Chain Sustainability School Modern Slavery Special Interest Group working collaboratively with other main contractors and suppliers to highlight risk areas within our supply chain.

We ensure that the objectives of the 'People Matter Charter' specifically around Modern Slavery are being integrated into our processes and those of our key Supply Chain.

We have worked with our managed service provider to review our approach to auditing our contingent labour supply chain, introducing a more robust compliance process. As well as company checks this also ensures that every contingent worker that enters site has been vetted and all right to work and identity checks have been carried out thoroughly.

We have also:

- Communicated our statement and sustainable procurement policy to all our internal employees.
- Communicated our statement to our supply chain members.
- Communicated our Safecall number to all direct and indirect workers.

## Prequalification Process

We have introduced additional requirements within our prequalification process in relation to Modern Slavery. This process is managed centrally by our compliance team.

We continue to work with Build UK as part of a cross industry body to embed the 'Common Assessment Standard', which will not only improve efficiency and reduce cost but will also raise the standard of prequalification, this includes a more robust approach to verifying Modern Slavery understanding and competence within our supply chain.

Moving forward we are introducing three levels of due diligence that will be based on the outcomes of a modern slavery risk mapping. These will be as follows

- Low Risk - Desktop audit (Build UK CAS),
- Medium Risk - Enhanced desktop audit (Step 1 + MS PQQ),
- High Risk (Steps 1+2 + on site audit or interview).

## Modern Slavery Review

In 2024 we worked with an independent consultant to undertake a full review of our current approach to Modern Slavery. This included a full review of our processes and procedures and assessed where we may have gaps or areas for improvement.

As an output, the report has given us tailored recommendations for how we could improve due diligence processes, policy and overall risk mitigation strategies. In 2025 we delivered a Modern Slavery action plan that is already being embedded in our business processes. We will continue its roll out during 2026 to ensure the objectives are fully embedded in all areas.

## Learning and Development

We continue to work with external partners to promote open access learning resources to train and develop not only direct employees but also our wider supply chain.

At the start of 2022 we launched a bespoke Modern Slavery eLearning module, with the aim of ensuring we continued to improve our understanding of the risks of modern slavery and set clear targets.

In 2026 we will be updating our eLearning module to ensure it is reflective of the current Modern Slavery landscape and the challenges that the construction industry faces in this regard.

As part of our Modern Slavery Action Plan we will also be delivering more targeted training to specific disciplines within our business.

We believe it is important to support the upskilling of our Supply Chain. We give free access to our VINCI Academy eLearning modules to support supply chain development. In 2026 we will continue to promote our module on modern slavery risk to our supply chain that have been designated as 'high risk' for modern slavery through our heatmapping process.

## What We Achieved in 2025

Through our alignment to the ISO 20400 sustainable procurement guidance standard, we have continued to embed measures into our processes to combat Modern Slavery and Human Trafficking. Our Modern Slavery working group in the UK, will continue to meet regularly and to push this agenda as well as producing a yearly statement to outline our progress.

In 2025 we

- Set up a sustainable procurement working group that is working to prepare us for re-assessment to ISO 20400.
- Continued to meet as a Modern Slavery working group as part of the Supply Chain Pivot club, to ensure consistency across our UK operations.
- Improved the due diligence process and vetting of our supply chain in relation to Modern Slavery and ensured it is consistent across our Division.
- Continued to update sustainable procurement heat maps, incorporating modern slavery risks.
- Continued to roll out the VINCI Modern Slavery eLearning module to our staff and our supply chain.
- Continued to engage with an external consultant to undertake a full review of our process in relation to the management of Modern Slavery risk.
- Started to implement our Modern Slavery action plan as a direct output of the 3rd party Modern Slavery review.

## What We Will Do in 2026

In 2026, we will –

- Continue to develop and embed our Modern Slavery Action Plan.
- Monitor the effectiveness of the plan through the introduction of KPI's.
- Fully implement our risk-based approach to identifying high risk areas within the supply chain.
- Be re-assessed to ISO 20400, the guidance standard for sustainable procurement.
- Continue to upskill our direct teams to ensure they are equipped to spot the signs of Modern Slavery.
- Work with our supply chain to give them the tools they need to mitigate modern slavery within their own business and our extended supply chains.
- Improve the measurement of how the supply chain is performing in relation to combatting Modern Slavery through the introduction of our new performance management process.
- Work with our labour MSP to improve the compliance process within contingent labour supply chains.

## Review

This statement is made in accordance with Section 54 (1) of the UK Modern Slavery Act 2015 and constitutes VINCI Construction Holding Limited Modern Slavery Statement for the financial year 31st December 2026, published January 2026. Our next statement will be published in January 2027.



**Scott Wardrop**

Chief Executive

VINCI Construction Holding Limited

*This policy applies to all delegations within the UK Division of VINCI Construction*