

Policy Summary

Modern Slavery and Human Trafficking Statement

Company Approach

EUROVIA UK Limited and its subsidiaries (collectively the Group) 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.

The Group 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 Group companies share a mutual code of ethics and conduct; the code is delivered by the Chief Executive. Principles of the code of ethics and conduct are reflected within our vision of developing our modern slavery statement.

The Group takes its responsibility to avoid and mitigate any modern slavery in its operations extremely seriously. To that end we have developed and reviewed our detailed policy and strategy originally running over 3 years to support this statement. 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 policy is communicated to our supply chain, embedded into our procurement policy and is part of the way we work.

Our People

We collectively work in line with the VINCI Manifesto and other key Ethics policies and Human Rights Guidelines issued by our ultimate parent company and available on their website www.vinci.com. These documents explicitly state how we operate as a business and the steps taken to ensure that we are a transparent, accessible and inclusive organisation. We additionally work to the below listed policies which are reviewed regularly and updated to ensure that ongoing opportunities for improvement are identified and acted upon. These policies include:

- o Anti-Bribery
- o Equality
- o Recruitment and Selection
- o 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 together with an external anonymous helpline run by Safecall, accessible to all 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.

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. For permanent staff we have implemented an outsourced recruitment platform to standardise our legislative approach to recruitment across the Group.

The forthcoming implementation of new IR35 Rules has initiated a review and audit of agency and PSC workers which has enhanced the scrutiny of the overall working practices of that group of suppliers and workers.

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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, the Group, in addition to those reported in previous Statements, has taken the following further steps:

1. Continued liaison and contribution to other parts of the wider UK and parent company businesses to support the embedding of modern ethical and human rights practices.
2. Further reviewed, developed and rolled out the method of recording information relating to modern slavery during the prequalification process in eSource (our Supply Chain onboarding platform) – sSource 2.
3. Introduced guidance for approvers to ensure poor responses from onboarding Suppliers are appropriately managed.
4. Identified risk areas within our Tier 1 supply chain.
5. Delivered training to all relevant direct employees.
6. Further developed our standard contractual terms to enhance obligations in relation to modern slavery.
7. The Group's ultimate parent company joined the United Nations Global Compact.
8. Produced an Ethical Procurement Policy.

Our policy and 3-year modern slavery strategy was developed by the dedicated Modern Slavery Working group, and, 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.

Having reviewed the original strategy in conjunction with the Group's own Business Plan targets, the following deliverables have been identified for the coming 12 to 18 months: -

1. Continued ongoing enhancements to eSource 2, in particular increasing the level of detail in relation to modern slavery within our pre-qualification process.
2. Circulating a Compliance communication to the Supply Chain.
3. Further review of the 2nd and below tier Supply Chain.
4. Further develop training and guidance information, in particular working with the Supply Chain Sustainability School to embed their Tool-Box talks into our own e-learning platform.
5. Produce a Supplier Code of Conduct.
6. Produce enhancements to the Ethical Procurement ethos within the Procurement Policy.

We will report on the progress of the above actions in our 2020 statement as well as set the ongoing objectives for the future.

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 2019.



Signed:
Scott Wardrop
Chief Executive

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