VINCI

VINCI'S GUIDE ON

HUMAN RIGHTS

LABOR MIGRATION AND RECRUITMENT PRACTICES | WORKING CONDITIONS | LIVING CONDITIONS |
HUMAN RIGHTS PRACTICES IN THE VALUE CHAIN | LOCAL COMMUNITIES

We have a duty everywhere to respect human rights.

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In the case of inconsistencies between the French original version and a translation, the French version shall prevail.

COMMITMENTS IN STEP WITH OUR CULTURE AND THE WAY WE WORK

No financial project without a social project

At VINCI, our view of performance is global. For us, the performance of our projects is not only a technical matter but is also measured by their social, environmental and societal added value. This responsible view is inseparable from our urban and regional development business, because what we do is for the long term and has a major impact on the societies within which we work.
In the same way, the performance of our businesses is not limited to their financial results: we are convinced that lasting financial success cannot be dissociated from an ambitious human project. This conviction nourishes the collective ambition that we wish to share with all our stakeholders, as we say in our slogan: "Real success is the success that you share".

Human rights and humanist values

Our attention to human rights is an integral part of our humanist culture. We have always prioritised people over systems. We are convinced that our staff are our main asset: their quality and their commitment allow our companies to make the difference in their projects and on their sites. Our decentralised organisation and our management methods flow from these humanist values: they value individual and collective initiative on the ground; they rely on trust, respect and solidarity to promote the professional fulfilment of our employees. Apart from our own staff, we endeavour to share this vision with all the employees of the local partners and subcontractors that work on our projects and sites.

Guidelines that extend the commitments in the VINCI Manifesto

Our human rights guidelines constitute a direct extension of the VINCI Manifesto, which covers all aspects of our corporate responsibility: collaboration with stakeholders, ethics, social, societal and environmental responsibility, and health and safety at work. The Manifesto is the foundation of our collective commitments, and applies to all our companies regardless of their business and the country where they are established. All VINCI's managers are the custodians of the Group's credibility with regard to its ability to comply with these commitments to all our stakeholders. The human rights guidelines have the same universal dimension within the Group.

OUR APPROACH

To support our international development

We are an international company with a presence in a growing number of countries, where we employ large numbers of people on our sites and in our businesses, whether by recruiting them directly or through our subcontractors. While the institutional context and working environment can vary markedly from one country to another, **we have a duty everywhere to observe the rights of those persons and of local communities** that might be affected by our projects and activities.

In order to do that, our intention is to apply local regulations and a common set of principles and guidelines concerning human rights in all countries where we operate, in all our businesses and in all our companies.

This common set of principles and guidelines is based both:

- on the commitments that we make pursuant to the international standards with which VINCI and its companies comply, and in particular the United Nations Guiding Principles on Business and Human Rights (see page 7);
- on the specific rules that we have set down for ourselves on the basis of those founding provisions, adapting them to the reality of our businesses and our projects.

To respond to the expectations of transparency on the part of the markets and our clients

Large companies are the subject of considerable expectations regarding the measures they put in place to prevent breaches of human rights. Such breaches can be caused by the companies themselves or can be indirectly associated with their activities, particularly through subcontracting.
There is a particular risk of this when companies operate in countries where human rights are considered to be under threat. A large listed company such as VINCI, which is analysed and monitored by investors and analysts on the international markets, has a duty to be transparent about its mechanisms to prevent such risks.

Transparency also satisfies our customers' expectations; this is particularly the case when the projects we carry out are financed by international lenders, which impose specific and exhaustive criteria regarding observance of human rights and require evidence from companies of their commitment in that area.
More generally, regardless of the contractual framework, making commitments on the way in which we deal with human rights is a positive differentiating factor for our customers. It confirms that we act as a socially responsible group which is concerned about the working and living conditions of employees on its sites. It is also a sign that we act with respect for local communities, controlling negative impacts and seeking to produce positive ones for local inhabitants.

"**Due diligence**": a requirement that is becoming increasingly important in civil society and international institutions

It can be seen that civil society's expectations of companies with regard to human rights are increasing. In particular, this was reflected in the adoption in 2011 of the United Nations Guiding Principles on Business and Human Rights which contain details of the responsibilities of companies and of states in this area and of the avenues of appeal open to the victims of breaches of human rights.

These United Nations Guiding Principles, which have been adopted by other large international institutions, are now regarded as the benchmark in terms of companies' management of the impact they have on human rights. In particular, they emphasise the "due diligence" that must be exercised by companies in this area – and particularly by international companies operating in countries where human rights are regarded as under threat. Today, many governments have reflected this concept of due diligence in their national regulations.

To protect our reputation

In a globalised world, a company's reputation flows from the reputation of each of its businesses, and even from each of its projects.
An event in one country or on one site can affect the company's global image through the media and news networks, which are themselves globalised.

HOW OUR HUMAN RIGHTS GUIDELINES HAVE BEEN PREPARED

The starting point of international standards

International bodies such as the United Nations, the Organisation for Economic Co-operation and Development (OECD) and the International Labour Organisation (ILO) have drawn up international standards in the area of human rights, which VINCI undertakes to observe.
Thus, as early as 2003, the Group voluntarily took the step of signing the United Nations Global Compact whereby it undertakes to respect human rights internationally and to ensure that it does not become complicit in breaches of those rights.

A framework document prepared jointly with the Group's business divisions

VINCI has prepared a framework document applicable to the entire Group which is based on the United Nations Guiding Principles and the main international conventions and of a specific study of the risks of negative impacts on human rights in certain geographical areas. It relies also on tools already in existence at VINCI (good practice guide in the context of the Cooperate initiative; International Labor Accommodation and Welfare Standards of Soletanche Freyssinet).
This work has been carried out by the Group's network of Human Resources Departments and business divisions, in collaboration with operational staff, in order to identify issues common to all the companies, the main risks associated with human rights and the principles and behaviour to be adopted to prevent such risks.

VINCI is therefore equipped with an operational tool that can be used directly by employees having to deal with matters affecting human rights, in all countries where the Group has a presence.

Main international conventions and standards to which we adhere:

- The Universal Declaration of Human Rights (UDHR).
- The International Covenant on Civil and Political Rights (ICCPR).
- The International Covenant on Economic, Social and Cultural Rights (ICESCR).
- The Fundamental Conventions of the International Labour Organisation (ILO).
- The OECD Guidelines for Multinational Enterprises.
- The United Nations Guiding Principles on Business and Human Rights.

This collective thinking has resulted in the identification of five areas in which VINCI's activities could have significant impacts on human rights.

These five areas cover the entire life-cycle of projects from the response to the call for tenders, the preparation of sites and construction to the commissioning and operating phases. In each of the five areas, specific situations and the corresponding practices to be implemented, known as "guidelines", have been identified. These, are VINCI's specifics guidelines and they may evolve in the future.

A progressive approach

The formalisation of these guidelines must be understood not as a coercive but as a progressive approach. VINCI companies, faced with local contexts which vary greatly from one country to another and which are not necessarily under their control, especially if their presence there is new, can now rely on explicit and specific recommendations to prevent the risks of breaches of human rights. These guidelines all constitute benchmarks to encourage employees dealing with human rights issues to take stock of their entity's practices and to identify areas for improvement. They will be implemented alongside initiatives to raise awareness, training and the sharing of information on best practice, in order to develop a culture of prevention in this area – as in the area of safety, for example.

VINCI'S HUMAN RIGHTS GUIDELINES

LABOR MIGRATION AND RECRUITMENT PRACTICES

Recruitment fees and debt
Contract substitution
Work visa, ID, passport, and exit permit

WORKING CONDITIONS

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Discrimination
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LIVING CONDITIONS

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Community dialogue, engagement, and remediation mechanisms

01 LABOR MIGRATION AND RECRUITMENT PRACTICES

In the context of some of our activities, we may have occasion to recruit migrant workers. Employment of such workers combines a variety of scenarios depending on the circumstances in which the migration took place (journeys, administration, recruitment, accommodation, etc.).
Breaches of the rights of migrant workers can result both from certain recruitment practices and from national legislation concerning migration.
The guidelines in this section specify the steps that must be taken to guard against potential forced labour situations (whether recruitment is carried out directly by the Group or indirectly through temp agencies).
Guidelines marked with an asterisk* do not apply to short-term projects and are only relevant in certain sensitive geographical areas.

Recruitment fees and debts

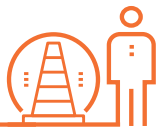
- No fees should be charged to candidates at any stage of the selection, recruitment, and deployment process.
- All contracts with recruitment agencies should include a "no fees" policy.
- Recruitment agencies should be transparent to user enterprises with regard to their practices, in particular the use of any agents/subagents and their costs and terms of engagement.
- The Company and its recruitment agencies should 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 should be made available to migrant workers.

Contract substitution

- The Company strictly prohibits the use of coercion, deception, or omission as part of the worker recruitment process.
- Migrant workers should be provided with written contracts in a language they understand, with all terms and conditions explained clearly prior to departure.
- The Company ensures that all the relevant information on workers' terms and conditions of employment and living arrangements are adequately communicated to workers by recruitment agencies, brokers, or the Company itself.

Work visa, ID, passport, and exit permit

- The Company must not withhold workers' personal travel or identity documents or any other personal items.
- The Company should provide safety box for every worker to safeguard personal documents and valuable items.*
- Original documents should be used by the Company only when strictly required for the purpose of registration with the national or local authorities. The documents should be promptly returned to the workers at the end of the process.
- Workers should have the freedom to terminate employment (provided they give reasonable notice) at any time without administrative or financial penalties (such as withholding or nonpayment of wages). The freedom to terminate employment should be mentioned in their employment contracts.



02 WORKING CONDITIONS

In the context of our operations, we ensure that our employees are guaranteed: health and safety with a "zero accident" objective and a balanced management system in an environment free of discrimination.
This part deals with the potential risks of breaches of fundamental employment rights that could result from a lack of vigilance concerning conditions of employment. For each of these topics, the guidelines detail the approach and the actions to be taken to guard against the risks of breaches of workers' fundamental employment rights at their place of work.
The guidelines marked with an asterisk* do not apply to shift work and to workers on oil rigs, for whom specific payment and compensation systems are in force (bonuses, payments, compensation in cash or in kind, paid holidays, etc.).

Wage levels

- The Company should respect minimum wage national legislations where they exist.
- The level of wages should correspond to the number of hours worked, particularly when overtime is performed.*
- Workers should be paid on time and on a regular basis, preferably directly to their bank account.
- Allowances deducted from salary should be justified, reasonable and clearly explained to workers.

Working hours

- The Company should respect national legislations on working hours and overtime, where they exist. The limitations on overtime shall be respected, even if an employee requests to work additional hours.
- Records of working hours per week should be kept and monitored by the Company.
- Overtime hours should be remunerated at least at the same rate as normal working hours.*
- Employee should have at minimum one rest day per week, except for specific types of work or situations, for which special rules on working hours and rest periods may apply.*
- Employees should have access to restrooms and should be allowed breaks during their workday.
- Rules on working hours and rest and break periods should be communicated to workers, in an accessible and understandable format at the outset of the employment relationship.

Paid holidays and other benefits

- The Company should always comply with the requirements of national laws on paid holidays.
- The Company should ensure that, if an occupational hazard occurs, workers are covered by death/permanent disability benefit schemes in the country of operations.
- The Company should strive to develop health insurance schemes when they do not exist or are not functioning well in the country of operation.

Workers representation

- The Company should respect national laws on freedom of association and right to collective bargaining.
- The Company should not discriminate against workers' representatives or against workers who seek to organize.
- Where the right to freedom of association and collective bargaining is restricted under law, the Company should facilitate the development of parallel means of workers' representation.

Hiring underage workers

- The Company has a policy regarding the minimum age for employment that complies with national laws but is no less than 15 years of age.
- The Company does not hire any children younger than 15. Similarly, the Company does not hire any children who have not reached the age when compulsory schooling ends in their country, unless they take part in formal apprenticeship programs.
- The Company does not hire or contract any workers under the age of 18 to work in dangerous conditions, in particular underground, underwater, at dangerous heights, or in confined spaces.

Discrimination

- The Company fights all forms of discrimination in hiring, in workplace relations, and in the career paths of its employees.
- The Company is committed to promote equal opportunities between women and men
- The Company strives to develop programs to promote diversity and to raise awareness about discrimination among its staff.
- Where possible, the Company aims to align the terms and conditions of work among migrant staff involved in their operations on the same worksite.
- The Company strives to implement grievance mechanisms so that workers can use them effectively to raise any work-related grievance.

Health and safety

- The Company should strive to develop health and safety policies that cover all individuals working on its project sites, irrespective of their employment status.
- The Company should give all categories of workers regular safety training.
- All workers should be provided with personal protection equipment tailored to the work assignment.
- Every employee should have access to sanitary and catering facilities (Except for at mobile worksites).
- Each work assignment should have a risk assessment process to identify and address potential dangers in the most appropriate way.
- The Company should implement a robust reporting system for workplace accidents and illnesses, including subcontractor statistics, using the Group's consolidated indicators.
- The Company should strive to develop a health policy addressing emerging health threats and psychosocial risks.

Worksite security

- The Company has the duty to protect its premises and on-site workers from all kinds of malicious acts.
- The Company should ensure workers security during their working hours, as well as during the time they spend at their living communities when they are under the responsibility of the Company.
- Employees should be aware of the Company's safety plan. Employees must comply with the Company safety standards without departing.
- Security arrangements should be implemented which respect human rights and fundamental freedoms.
- Whenever possible, before settling a security arrangement, the Company should organize a security risk assessment (SRA) to make sure it adopts measures proportionate to the security context in which it operates.
- The Company should engage regularly with stakeholders regarding its security arrangements.
- The Company should have a formal process to collect and address complaints related to the implementation of security measures and potential allegations of human rights abuses.

03 LIVING CONDITIONS

When companies make accommodation available to workers working on their sites, they must guarantee the physical security and safety of the occupants. The accommodation must satisfy the workers' basic needs (namely, supply of and access to potable water, sanitary facilities, hygiene, privacy, etc.).
This section of the guidelines concerns fixed accommodation made available to workers. It sets out the conditions to be observed and the steps to be taken to guarantee decent accommodation conditions in accordance with international recommendations on this subject.

Labor community standards on accommodation: health, safety and security

- The Company should provide safe, clean, and hygienic workers' accommodations, with potable and running water and adequate sanitary facilities, as well as temperature-control equipment where necessary.
- The Company should provide workers with personal space and ensure an adequate level of privacy. The Company should also provide a safety box for every worker living in the community.
- The Company should respect all relevant building regulations, particularly regulations related to multiple-occupancy dwellings.
- The Company should implement adequate management systems to ensure that facilities remain clean and safe at all times.
- The Company should provide services such as laundry, Internet, etc., when possible, at no cost to workers. When services in labor communities are not free (e.g., groceries, phone services, etc.), the Company should not make any profits on these sales.
- The Company should take account of migrant workers' diversity in their dietary needs, develop appropriate meals when possible, and provide accurate information regarding food.

Freedom of movement, consultation, and grievance mechanism

- The Company should not keep identity documents. If migrant workers specifically request that the employer holds their documents for safekeeping, there should be clear and simple procedures for workers to take back their documents at any time.
- The Company should provide a safety box for every worker living in the accommodation.
- The Company should ensure that any restriction on workers' ability to move freely in and out of the accommodation is limited to what is strictly necessary and duly justified.
- The Company should strive to establish a dialogue with the workers concerning the accommodation arrangements in the living facilities.
- Grievance mechanisms should be available and accessible to workers.

04 HUMAN RIGHTS PRACTICES IN THE VALUE CHAIN

The prevention of risks of breaches of human rights in the value chain requires detailed knowledge of the management practices of the contractual partners working on our projects. This is therefore a continuous process which can only be implemented on a long-term basis.
The guidelines specify an approach that aims to gradually secure our value chain. The VINCI Guidelines on Human Rights specify the steps that can be taken by the Group's companies to achieve this. The term "value chain" refers to "subcontractors".
In the case of a concession/PPP scheme, the value chain also includes the main contracting companies, which are the main contractor and the operator.

Raise awareness, identify risks and enter into contractual agreements

- Raise managers' awareness of the potential human rights issues related to the activities of subcontractors and the prime contractors involved in the project.
- Identify the most critical human rights issues related to the subcontractors' and the prime contractors' activities, involved in the project.
- Introduce specific references to human rights-related issues as part of the tendering and contractual process with the subcontractors and the prime contractors.

05 LOCAL COMMUNITIES

Construction projects and projects for the operation of infrastructures can have impacts on local communities. Initially, the Client is generally responsible for relations with the local populations affected. However, concessionaires and construction companies also have responsibilities. They must work in close collaboration with the client to identify, avoid and mitigate negative impacts on the environment and on communities' means of subsistence.
In this section, the guidelines provide detailed recommendations to avoid breaching the fundamental rights of local communities and to minimise the potential negative impacts that a company might be confronted with when dealing with local communities. The implementation of these recommendations concerns major infrastructure projects, concessions or construction works.

Socio-environmental issues

- The Company should seek to understand the potential negative impacts of its projects on local communities as early as possible by mapping potential risks and conducting a community impact assessment.
- The Company should strive to develop an action plan that details actions to minimize, mitigate, and/or compensate for adverse social, environmental, and economic impacts, while identifying opportunities and actions to foster positive impacts of the project on the local communities.
- The Company is encouraged to assess the positive socioeconomic impacts of its activities on the area, and to adopt measures fostering such impacts (e.g., training and hiring local low-skilled workers, developing a locally-rooted supply chain, etc.)
- When possible, at the end of the project, the Company should seek to convert its infrastructures into facilities that can benefit local populations (e.g., health center, community center, recreational area, etc.).

Land-related issues

- The Company should seek to develop project designs that minimize physical and/or economic displacements.
- The Company should review and understand any land and resettlement plans related to their projects that are implemented by a third party.
- When building infrastructure, the Company should take into consideration and seek to minimize the adverse social and economic impacts resulting from land acquisition or restrictions to land access and use for the communities.
- When working on a project, the Company is encouraged to contribute to any grievance mechanisms in place so that local communities can raise any land-related concerns.

Community dialogue, engagement, and remediation mechanisms

- The Company should strive to develop a mapping of local stakeholders involved or affected by the project.
- Prior to the commencement of the project, the Company should initiate a stakeholder dialogue that includes representatives of local communities affected by the project.
- The Company should set up an effective and easily accessible community-based grievance mechanism.
- The Company should develop adequate remediation plans to manage complaints arising from local communities.

Native peoples have rights
over the lands where they live
and/or that they cultivate [...].

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VINCI
1973, boulevard de La Défense
CS 10268
F–92757 Nanterre Cedex
Tel.: +33 1 57 98 61 00
www.vinci.com