

# Policy Summary

## Modern Slavery and Human Trafficking Statement

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 2021.

### **Company Approach**

EUROVIA UK Limited and its associated business delivers highways and public infrastructure projects in the UK. The majority of our work is delivered for local highway authorities and is delivered with local people, for local communities up and down the country.

Our ultimate shareholder: VINCI, is a signatory to the United Nations Global Compact which adheres to the ten principles covering Human rights, Employment regulations and Anti-corruption. Our businesses in the UK work collaboratively with our Supply Chain to deliver these principles, whilst also adhering to our core values: versatility, openness, resilience, and integrity.

Our businesses share a mutual code of ethics and conduct; all of our people are responsible for following and implementing these standards. These principles are reflected within our vision to delivering our modern slavery approach.

Eurovia UK 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 Policy is communicated to our supply chain, embedded into our procurement policy and is part of the way we work.

Our businesses do not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

### **The Way We Work**

We collectively work in line with the VINCI Manifesto and other key Ethics policies and Human Rights Guidelines. These are available on their website [www.vinci.com](http://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 policies listed below, which are reviewed regularly and updated to ensure that ongoing opportunities for improvement are identified and acted upon. These policies include:

- Anti-Bribery
- Equality, Diversity and Inclusion
- Recruitment and Selection
- Whistleblowing

We carry out Right to Work checks on all employees joining our organisation. All employees are asked to provide evidence that they are in possession of their own identification documents and we conduct checks to ensure that the bank account details provided, belong to that employee. Any discrepancies identified are investigated thoroughly and appropriate action taken.

We have internal procedures and 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 Employee 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 undertake annual reviews with these partners. For permanent staff we have implemented a commercial agreement with a recruitment process outsourcing provider to standardise our legislative approach to recruitment across our businesses, including off payroll working rules (IR35), which were implemented with effect from 1st April 2021.

# Policy Summary

## Modern Slavery and Human Trafficking Statement

### 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, we continue to take the following steps:

1. Continued liaison with our UK and global businesses to support the embedding of best practice, modern ethical and human rights practices.
2. Continuous development of recording information relating to modern slavery during the prequalification process in eSource 2 (our Supply Chain onboarding platform).
3. Updating guidance for approvers to ensure poor responses from onboarding Suppliers are appropriately managed.
4. Identified risk areas within our Tier 1 supply chain and adjust our processes to reflect target areas of improvement.
5. We continue to raise awareness via our intranet and provide ongoing specific training through our online eLearning hub.
6. Continuous improvement of our standard contractual terms to enhance obligations in relation to modern slavery.
7. Development of Sustainability Procurement Policy to include reference to modern slavery.

Our policy and 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 our own 2025 Business Plan targets, the following deliverables continue to be identified for the coming 12 to 18 months: -

1. Circulate a compliance communication to the Supply Chain.
2. Further review of potential risk areas for our 2nd and below tier Supply Chain.
3. Produce a Supplier Code of Conduct.
4. Produce enhancements to the Ethical Procurement ethos within the Procurement Policy.
5. Develop a procurement prioritised heat map identifying key sustainability impacts against spend categories procured in the business.

We will report on the progress of the above actions in our 2022 statement as well as set the ongoing objectives for the future.



Signed:  
Scott Wardrop  
Chief Executive

Issue:  
June 2022