

GUIDELINES

# ALL-ROUND PERFORMANCE OF PURCHASING PARTNERS



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# FOREWORD

The VINCI Group is actively pursuing a policy to drive its all-round performance as part of its firm belief that sustainable economic success cannot be achieved without efforts to lead an ambitious human project and improve its workforce-related, social and environmental performance.

A tangible and unwavering commitment from all the Group's purchasing partners is key to reaching the targets outlined in the policy. As such, the Group's purchasing partners are invited to uphold these values while complying with the fundamental principles for putting those values into action.

These guidelines reflect VINCI's determination to engage its **purchasing partners** in its all-round performance policy.



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#### ► “Purchasing partner”

This term refers to any VINCI Group supplier, service provider or subcontractor.

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#### ► “VINCI Group”

This term refers to the company VINCI SA or any entity belonging to VINCI SA with which the **purchasing partner** has entered into a contractual relationship.

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The purpose of these guidelines is to:

- Reiterate the principles and commitments that govern and influence the VINCI Group's actions.
- Specify the behaviour and conduct that the VINCI Group expects from its purchasing partners in terms of complying with business ethics practices, respecting human rights and labour standards, protecting people's health and safety, and protecting the environment.

These guidelines apply to all purchasing partners that have entered into a contractual relationship with a Group entity, irrespective of the country in which they operate.

By adhering to these guidelines, purchasing partners also agree to bind their own suppliers, service providers and subcontractors to the Group's all-round performance policy.

# OVERVIEW OF THE VINCI GROUP'S VALUES AND COMMITMENTS

VINCI is a world leader in concessions, energy and construction, active in more than 120 countries. In response to the challenges facing today's world, the Group is focused on its ambition of forging a sustainable world by accelerating the transition of living spaces, infrastructure and mobility while protecting the environment and by acting as a humanist group that stands for inclusion and solidarity. Its mission is to design, finance, build and manage infrastructure and facilities that help improve daily life and mobility.

Because its projects are in the public interest, the VINCI Group considers that it has a duty to reach out to its stakeholders in all its business lines and to engage in dialogue with them. The Group has published a Manifesto with universal commitments meeting that objective.

## The VINCI Group's Manifesto and reference documents

The Manifesto lays down the commitments that the Group has made for its stakeholders to improve its workforce-related, social and environmental performance, driven by a strong set of core values championed by all the Group's employees.

### THE GROUP'S VALUES ARE ENSHRINED IN FIVE REFERENCE DOCUMENTS:

- Code of Ethics and Conduct
- Anti-Corruption Code of Conduct
- Guide on Human Rights
- Declaration on Essential and Fundamental Actions concerning Occupational Health and Safety
- Environmental Guidelines



▶ The VINCI Manifesto can be downloaded from the VINCI website:  
<https://www.vinci.com/vinci.nsf/en/manifesto/pages/index.htm>

## Group participation in the United Nations Global Compact and other international standards

In 2003, VINCI signed the United Nations Global Compact and thereby confirmed its commitment to apply and promote the Ten Principles among all its partners.

In addition to the United Nations Global Compact, VINCI adheres to the following international standards:

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

## Closer look at the five reference documents defining the Group's core values



In accordance with Commitment no. 2 of the Manifesto, the **Code of Ethics and Conduct** lays down all the principles of business ethics that apply in all circumstances, in all countries where the Group operates and to all companies and their employees.

▶ <https://www.vinci.com/publi/manifeste/eth-2017-12-en.pdf>



The Code of Ethics and Conduct is used in tandem with the **Anti-Corruption Code of Conduct**, which details the rules concerning the prevention of all acts of corruption, notably identifying risks in the business processes and defining conduct to be avoided.

▶ <https://www.vinci.com/publi/manifeste/cor-2017-12-en.pdf>



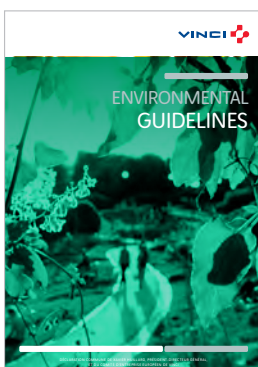
The **Guide on Human Rights** reiterates the risks identified and their implications for the Group's companies, and presents a common set of guidelines on how to handle issues concerning human rights.

▶ [https://www.vinci.com/publi/manifeste/vinci-guide\\_on\\_human\\_rights-en.pdf](https://www.vinci.com/publi/manifeste/vinci-guide_on_human_rights-en.pdf)



As an extension to Commitment no. 5 of the Manifesto, the **Declaration on Essential and Fundamental Actions concerning Occupational Health and Safety** reflects a shared determination to achieve the "zero accident" objective.

▶ <https://www.vinci.com/publi/manifeste/sst-2017-06-en.pdf>



Finally, in accordance with Commitment no. 3 of the Manifesto, the **Environmental Guidelines** form the backbone of the shared culture that the VINCI Group champions to protect the environment and reflect its ambition of providing environmental solutions in all its business lines.

▶ <https://www.vinci.com/publi/manifeste/dir-env-2020-11-en.pdf>

# COMMITMENTS OF THE GROUP'S PURCHASING PARTNERS

In accordance with the Group's commitments and values, VINCI expects each of its purchasing partners to observe and enforce the principles and values set out in these guidelines throughout its own supply chain.

These principles draw their inspiration from the Ten Principles of the United Nations Global Compact.



## Human rights

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VINCI expects its purchasing partners to respect human rights by avoiding, mitigating and remedying any current or future negative impacts in the following areas.

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### **Illegal work, undeclared employment and forced labour**

Purchasing partners should exclude any form of illegal work, undeclared employment or forced labour, as well as the use of any unlawful coercive measures.

### **Discrimination**

Purchasing partners should exclude any form of discrimination in respect of employment and occupation on the basis of social origin, age, religion, disability, sex, political opinion, trade union membership or any other criterion with no bearing on the position held.

### **Child labour and underage workers**

Purchasing partners should respect underage workers' rights by excluding any type of work by people under the age of 15 and/or the minimum legal age specified by applicable legislation in the country concerned. In accordance with the ILO's recommendations, purchasing partners should not employ people under the age of 18 to work in hazardous conditions that are likely to jeopardise their physical and mental development.

### **Wage levels and working hours**

Purchasing partners should comply with applicable legal requirements in the countries where they operate, especially concerning wage levels and working hours. They should pay wages, including overtime hours, as well as adequate benefits, while complying with minimum legal rest periods and wages.

### **Freedom of association and expression**

Purchasing partners should respect national laws on the freedom of association and the right to collective bargaining. Where such rights are restricted under applicable legislation, purchasing partners should facilitate and not impede the development of parallel means of workers' representation and association.

### **Hygiene, health and safety**

Purchasing partners should play a proactive role in improving occupational health and safety performance and engaging with the "zero accident" objective pursued by VINCI and its subsidiaries, while ensuring that their business activities do not harm the health and safety of their employees, their own suppliers and direct/indirect subcontractors, the population, and the people using their products/services. When providing their employees with accommodation, they should comply with national and international standards, especially relating to health, safety and hygiene.

### **Local communities**

Purchasing partners should identify and remedy any potential adverse social and economic impacts on the local communities and indigenous/native populations.



## Business ethics

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VINCI expects its purchasing partners and each of their employees to comply with the applicable laws and regulations in all countries where they operate, demonstrate loyal conduct in all their business relationships and act in accordance with the principles set out in the *VINCI Code of Ethics and Conduct*.

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In particular, VINCI expects a commitment from its purchasing partners to:

### Promote a culture of integrity

VINCI's purchasing partners should adopt a culture that promotes integrity and prevents the risk of ethical violations within their reciprocal organisations. They should take all necessary measures, including training, to ensure that their employees clearly understand the content of these guidelines and VINCI's commitments to improve its all-round performance.

### Fight against corruption

The award, negotiation and execution of public and private contracts must not involve behaviour or acts that could be deemed active or passive corruption, complicity in influence peddling or complicity in favouritism. Purchasing partners should implement measures to exclude and tackle all behaviour or acts that could be described as such.

Purchasing partners should ensure within their respective organisation that none of their employees or entities directly or indirectly receives or grants to a third party any undue advantage of any kind, through any means whatsoever, with the aim of obtaining or maintaining a commercial transaction or preferential treatment.

Purchasing partners should ensure that their employees avoid relations with third parties that could place them in a position of obligation and raise doubts as to their integrity. Similarly, they must take care not to expose to such a position a third party whom they are striving to convince or encourage to do business with the company that they are representing.

Purchasing partners should ensure that their employees are aware of the risk of a conflict of interest and encourage them to declare any potential or established conflicts of interest. In the interests of transparency, VINCI expects its purchasing partners to immediately inform the VINCI entity with which they are contracting of any potential conflict of interest with the project stakeholders and the corrective measures that they are planning to implement or have already taken.

### Comply with competition law

Purchasing partners should perform their business activities in accordance with applicable competition law and exclude any improper or unlawful conduct and any practices that prevent or restrict competition.

Purchasing partners should refuse any conduct that unlawfully infringes free competition, including:

- An agreement among competitors, for price fixing not based on free market pricing by artificially favouring price increase or decrease, by limiting or controlling production or technical progress, or by allocating markets.
- Abuse of dominant position, in which a company seeks to take advantage of the position it holds in a market to oust its competitors.

- Abusive exploitation of a position of economic dependence in which a client or supplier of a company finds itself with respect to the latter.
- Submission of a bid that competes with VINCI's own tender without implementing an ethical wall.

#### **Comply with applicable international sanctions and foreign trade rules**

Purchasing partners should ensure that their transactions and business activities are not likely to infringe on applicable regulations relating to economic, financial or trade restriction measures or sanctions, embargoes, or import and export controls, or the global fight against money laundering and terrorism financing.

#### **Comply with applicable taxation regulations**

Purchasing partners should promptly declare and pay all charges, taxes and levies for which they are liable under applicable laws.

#### **Respect privacy and personal data**

Purchasing partners should respect the privacy, personal data and confidential information of all their employees, customers and business partners, and protect such data against any unlawful use. They must process the personal data to which they have access in accordance with applicable personal data protection regulations.



## Environmental ambition

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The Group expects its purchasing partners to use their best efforts to minimise the impact of their business activities on the environment. As such, they should:

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### **Assess and mitigate their environmental impacts**

The Group's companies should enforce applicable laws and regulations.

### **Act for the climate**

The Group is taking action to control its energy use and reduce its greenhouse gas emissions from both its direct operations and across its value chain.

### **Optimise resources thanks to the circular economy**

The circular economy involves using fewer raw materials, producing less waste, consistently segregating and recovering waste (reuse, recycling, energy recovery, etc.), and promoting the circular economy.

### **Preserve natural environments**

Throughout the project life cycle, the Group's entities should strive to have as little impact as possible on natural environments and restore the ecological balance.

### **Reduce the impact on water resources**

The Group is endeavouring to develop solutions to protect water resources.

### **Protect biodiversity**

Implement solutions during any works or construction projects to avoid, reduce or ultimately offset their impacts.

### **Promote eco-design principles**

The environmental aspects of products and services should be taken into account both upstream and downstream of the value chain.

# SUPPORTING THE GROUP'S PURCHASING PARTNERS IN IMPROVING ALL-ROUND PERFORMANCE

This sustainable procurement strategy involves considering non-financial criteria in purchasing decisions and supporting purchasing partners in their social and environmental practices, in alignment with the Group's commitments.



## Sustainable procurement

### Non-financial reporting

The Group expects its purchasing partners to provide accurate qualitative and quantitative information about their business activities, structures, governance and financial / non-financial situation so that it can fulfil its own non-financial reporting obligations according to a predefined format.

### Control over the value chain

VINCI expects its purchasing partners to take appropriate measures to ensure that their own suppliers and subcontractors comply with the principles and commitments laid down in these guidelines.

### Performance evaluation

Purchasing partners agree to the principle whereby they may be subject to the following at the Group's request:

- Surveys or evaluations aimed at ensuring compliance with the principles set out in these guidelines
- A physical audit in relation to the principles defined in these guidelines

Where specific circumstances prevent purchasing partners from meeting any one of the principles in these guidelines, they must inform the VINCI Group without undue delay, so that both parties can agree on the necessary corrective measures.

### Progress support policy

The Group is committed to supporting its purchasing partners in steadily enhancing the environmental, social and workforce-related quality of their proposals and practices, including business ethics.

Consequently, for all purchasing partners wishing to engage in such a support scheme, the VINCI Group will work alongside them in defining a progress plan for implementing these principles and improving compliance.

This scheme will feature occasional reviews into the partners' progress actions and will allow VINCI and its purchasing partners to exchange best practices.




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#### ► "Progress plan"

A progress plan refers to a series of actions aimed at addressing any shortcomings identified during the evaluation.

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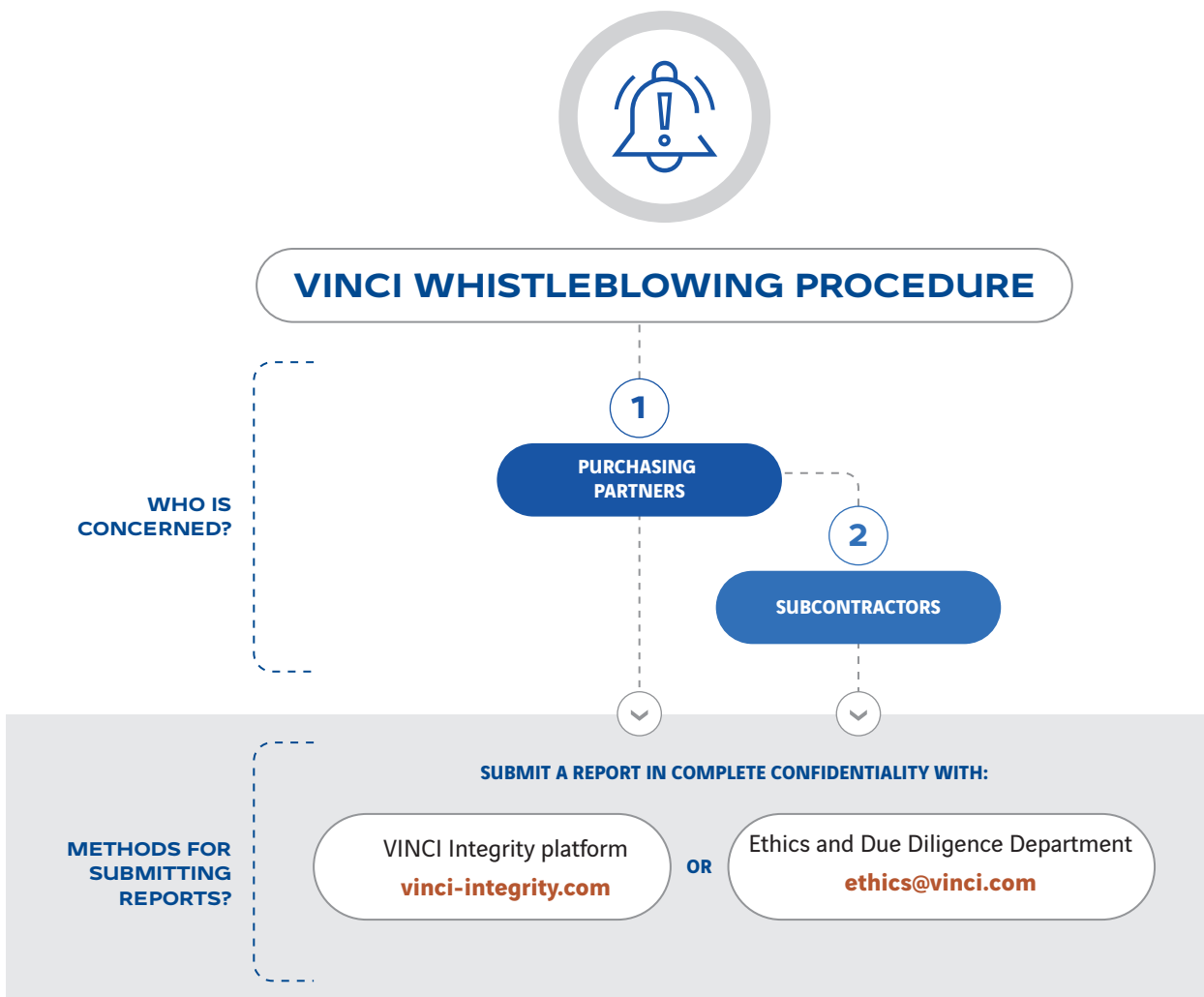
### Whistleblowing procedure

As part of its mechanism to prevent and detect acts of corruption, as well as its vigilance plan to prevent risks associated with human rights and basic freedoms, human health and safety and the environment, and more generally as a measure to ensure proper implementation of its *Code of Ethics and Conduct* and its *Anti-Corruption Code of Conduct*, the VINCI Group has set up a system to gather and process reports in complete confidentiality relating to its activities.

The Group expects its purchasing partners to inform their employees and their own subcontractors that they can submit reports, including through the VINCI Group's whistleblowing system.

Purchasing partners, their own subcontractors and their employees can report their concerns, including anonymously, as follows:

- By using the dedicated VINCI Integrity online platform:  
[vinci-integrity.com](https://vinci-integrity.com)
- By contacting the Group Ethics and Due Diligence Department at:  
[ethics@vinci.com](mailto:ethics@vinci.com)





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