

MODERN SLAVERY AND HUMAN TRAFFICKING

STATEMENT

COMPANY APPROACH

As the railway subsidiary of Eurovia and part of the VINCI Group, **ETF** is committed to operate its activities according to a Code of Ethics and Conduct which is delivered by the Chairman and Chief Executive Officer of the VINCI Group. Principles of the Code of Ethics and Conduct are reflected within our vision of developing our modern slavery statement.

In line with the VINCI Manifesto, a new guide has been published to ensure that human rights are respected throughout the Group. These guidelines apply to all companies in the VINCI Group wherever they operate their activities. They are based on the United Nations Guiding Principles and on the main international conventions which VINCI undertakes to observe:

- 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

ETF offers 7 core activities to deliver global railway solutions: national railway network, urban transportation network, private and industrial railway sidings, overhead line and power, freight, signaling and railway civil engineering. It is an international organisation with a presence in different countries around the world such as France, Germany, Luxemburg, Poland, Egypt, Guinea, Gabon, Chile and Canada.

With over 2,200 employees on our sites and in our businesses, and while the institutional context and working environment can vary 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.

To do so, our engagement 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 subsidiaries. Our approach to modern slavery is governed by our main board who provides strong leadership, continually striving for best practice and leading by example. In accordance with this approach, we are making sure to develop and continuously implement robust processes in our operations and in collaboration with our local partners.

OUR PEOPLE

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

- Health & Safety Policy
- Employee Code of Conduct
- Modern Slavery Policy
- CSR policy on Handicap
- VINCI Guide on Human Rights
- VINCI Manifesto Together

Our attention to human rights is an integral part of our culture. We have always prioritized people over systems. We are convinced that our staff



are our main asset: their quality and their commitment allow our company to make the difference in our projects and on our sites. We rely on trust, respect and solidarity to promote the professional fulfilment of our employees. We endeavor to share this vision with all the employees of the local partners and subcontractors that work on our projects and sites.

In collaboration with our JV partners / local partners, right to work and pre-employment checks are carried out on employees joining our projects and this includes the employee being able to provide evidence that they are in possession of their own identification documents. Any discrepancies identified are investigated thoroughly and appropriate actions taken.

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, ETF has taken the following steps:

1. Started recording information relating to modern slavery during the prequalification process.
2. Communicated its policy and statement to internal employees.
3. Communicated its policy and statement to its supply chain.
4. Communicated its Safecall number to all direct and indirect workers.

As is detailed in our 3-year strategy, some of the key actions we will deliver in year 1 are to:

1. Increase the level of detail in relation to modern slavery within our pre-qualification process.



2. Introduce guidance for approvers to ensure poor responses are appropriately managed.
3. Identify risk areas within our supply chain.
4. Develop appropriate training and guidance information.
5. Deliver training to suppliers that fall within high risk categories.
6. Deliver training to all direct employees.
7. Develop our standard contractual terms to enhance obligations in relation to modern slavery.

This statement is made in accordance with Section 54 (1) of the UK Modern Slavery Act 2015 and constitutes ETF's Modern Slavery Statement for the financial year end 31st December 2019.



Fabrice GUEGAN
Company President
ETF