

Declaration on human rights

We undertake to respect internationally recognised human rights in the countries in which Eiffage operates.

Our approach draws on the Universal Declaration of Human Rights, the United Nations Global Compact, 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, the EU Taxonomy Regulation, the 2017 French law on the duty of care and the 2015 UK law on modern slavery.

This declaration aims to reiterate our main commitments and to present our approach to respecting human rights as a complement to our 2022 statement on modern slavery and human trafficking.

On human rights

Human rights are inalienable and universal. Everyone enjoys all the rights and all the freedoms stated without any discrimination on the basis of race, sex, nationality, ethnic origin, language, religion or any other situation.

These encompass a broad range of rights established by the international guidelines on defending and protecting human rights and in particular the “International Charter of Human Rights”, consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights (right to life, the right not to be subjected to torture or slavery, the right to privacy, freedom of thought, conscience and religion, the freedom of opinion and expression, etc.) and the International Covenant on Economic, Social and Cultural Rights (right to work and just and favourable conditions of work, right to non-discrimination and equality between men and women, freedom to join a union and the right to strike, the right to education, etc.).

Our commitment to respect human rights

We unequivocally undertake to respecting human rights.

Our commitment covers everyone working for Eiffage around the world, including those on expatriation assignments or on secondment, subcontractors, suppliers, consultants, temporary staff, job applicants, those people working for Eiffage via a third party and those interacting with us at every level.

At Eiffage, we are determined to make sure that our entities, our suppliers, our service providers, our subcontractors and our temporary staffing agencies respect the Group’s commitments to human rights.

For many years, the Eiffage Group has abided by internal and third-party ethics guidelines applicable to all relevant stakeholders – the Group's employees foremost among them.

The **core values charter**, which sets out the intangible principles that any employee must be aware of and respect, was published in 2019 and translated into the main languages of the Group's subsidiaries outside France.

The six values have been restated and their content redefined

- **Leading by example**, whatever the circumstances, we act in an ethical, honest manner that is perfectly within the rules;
- **Trust** - we have trust in our employees, our cross-business relationships within the Group and our relationships with stakeholders;
- **Responsibility** - everyone has a role in safeguarding the people and equipment under our responsibility;
- **Transparency** - information provided must be accurate, complete and shared in a timely manner;
- **Lucidity** helps to ensure we set attainable goals and we respect our commitments.
- **Courage and pugnacity** - a fighting spirit is necessary to weather periods of slower business.

They apply to all Group establishments and guarantee compliance with the Group's international CSR commitments, including efforts to combat breaches of human rights.

All the countries in which the Group operates have ratified the fundamental conventions of the International Labour Organisation (ILO). Eiffage is fully committed to respecting the rules on the freedom of association and the right to organise (C87-C98), discrimination (C100-C111), abolition of forced labour (C29-C105), minimum wages (C131) and child labour (C138-C182).

The Group endeavours to pay its employees a decent wage, in accordance with the company-level and collective bargaining agreements applicable in countries and business lines in which the Group operates.

By joining the **Global Compact** in **2005**, Eiffage made a commitment to incorporate, spread and advance the major United Nations principles. The Global Compact encourages companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption.

Every year, the Group renews its commitment in a statement to the UN Secretary General, setting out all Group actions aimed at achieving the objectives defined in accordance with the Global Compact principles.

Lastly, Eiffage observes the six key stages in a reasonable due diligence process in terms of respecting human rights in the **UN Guiding Principles on Business and Human Rights** and undertakes to tighten it up on a regular basis as and when risk factors come to light.

Governance of human rights

Effective governance of its duty of care is necessarily cross-functional, given Eiffage's decentralised organisation and the constant interaction of its multiple business lines, particularly with respect to decision-making.

Global governance:

Eiffage's compliance governance committee reviews on a regular basis how the duty of care plan is implemented and makes decisions on new measures to be taken to respect human rights;

By human resources:

The human resources departments of divisions implement a policy of non-discrimination as part of a broader approach to respecting human rights;

By purchasing:

The Group's purchasing department implements a responsible purchasing strategy and supplier assessment procedures in line with our undertakings to respect human rights.

Analysis of our human rights risks

The risks arising from a breach of human rights may apply anywhere in our operations, in situations related to direct jobs, outsourcing or the supply of goods and materials.

The risks of a serious breach of human rights potentially arising from the Group's activities have been identified and assessed as part of the risk map focused specifically on the duty of care. This mapping exercise is updated ever year and presented to the Group's board of directors.

The major risks related to the human rights are as follows:

- diversity and equal opportunities;
- a deterioration in industrial relations;
- personal data breaches (affecting customers or employees).

These risk factors are presented in greater detail in our Universal Registration Document.

What's more, Eiffage faces other human rights-related risk factors (forced labour, illegal working, etc.) to which its exposure is limited and addressed through measures making the threat they pose less critical.

Eiffage operates predominantly in Europe, in countries with a high degree of maturity and with extensive regulations on the protection of human rights. The main risks of serious breaches of human rights identified have been assessed as having a limited impact. Specific measures have been implemented at the few projects established by the Group outside France and the rest of Europe.

Our initiatives to respect human rights

The action plan implemented by Eiffage to identify and prevent serious breaches of human rights arising from its operations is outlined in its duty of care plan.

This plan was drawn up by risk management and compliance based on input from the sustainable development and transversal innovation department, the purchasing department and the human resources and prevention-safety departments. It is updated every year and approved by the Group's governing bodies, including its board of directors.

Actions to mitigate and prevent serious breaches of human rights at Eiffage:

Actions to mitigate the main risks of serious human rights violations have been validated by Executive Management and the board of directors of Eiffage.

Diversity and equal opportunities:

Building a diverse pool of talent, a factor well-known to boost performance and innovation, is a top priority for Eiffage. The Group implements a proactive human resources policy backed up by quantified targets. It aims to combat all forms of discrimination based on 25 discrimination criteria prohibited by law through the following measures:

- initiatives by the Eiffage foundation, including supporting access-to-employment programmes for the long-term unemployed and people living with disabilities;
- partnerships established with local access-to-employment partners to make people without any qualifications and the long-term unemployed more employable;
- introduction of a suitable training plan for recruitment partners;
- implementation of specific approaches, action plans and collective agreements to promote gender equality;
- our diversity policy that aims to put into practice Eiffage's commitment to strive for greater diversity and inclusion by combating against all forms of discrimination, which is signed by Eiffage's Chairman & Chief Executive Officer;
- appointment of an officer responsible for establishing and coordinating the diversity and equal opportunity policy, who reports to an Executive Committee member.

Deterioration in industrial relations:

Eiffage is keen to play a part in improving working conditions by forging a constructive social dialogue based on the following organisation and initiatives, everywhere where it operates:

- social dialogue at Group level conducted by the Chairman & Chief Executive Officer and a responsible Chief Human Resources Officer;
- adaptations at each division and at each reporting entity to reflect their organisation and the range of their activities;
- recognition of the contribution made by employee share ownership by giving them a share in Eiffage's growth through employee share ownership and profit-sharing;
- involvement of employee representatives in formulating Eiffage's strategy: two directors representing employees and one representing employee shareholders sit on the Board of Directors.

Personal data breaches (employees and stakeholders):

Over the course of several years, Eiffage has taken steps to comply with the General Data Protection Regulation (GDPR). These have included the appointment of a Data Protection Officer (DPO) in 2016 and the following measures:

- events and initiatives led by the GDPR committee and the Group DPO;
- awareness-raising, communications educating people about GDPR issues and training;
- complementary initiatives by the cybersecurity department.

Actions to mitigate and prevent serious breaches of human rights vis-à-vis our suppliers:

Actions to mitigate and prevent serious breaches of human rights are also carried out at our suppliers:

- subcontractors: clause added to contracts and use of master agreements managed by the purchasing department, awareness-raising during outsourcing-related training;
- temporary employment: carefully controlled use of temporary employment within the Group, with temporary employment agencies operating under framework agreements and the use of the Sextant temporary staffing system in France and adaptations of this approach through the signature of local agreements outside France. Random spot checks carried out by Eiffage (identity papers, secondment agreement);
- suppliers: clause added to contracts and audits.

Our third-party due diligence process:

At Eiffage, we take great care to ensure our subcontractors, suppliers and partners embrace our high ethical standards of protection of, advocacy for and support of human rights, especially the fight against poor labour practices.

The duties, responsibilities and legislative requirements incumbent on our supply chain apply to their own employees, their working conditions and those of their own supply chain, and are outlined in contractual clauses specified in contracts and in our general terms and conditions for purchases.

Subcontractors, suppliers and partners with which the Group maintains an established business relationship are assessed under a third-party due diligence procedure included in the internal risk management guide, which has been translated into several languages and is available to all Group employees on Eiffage's intranet.

The procedure explains the practicalities of the due diligence process – the scope covered by the assessment, the varying levels of control and the follow-up action to be carried out, based on the findings.

The Group has rolled out tools offered by specialised service providers as a due diligence platform that can launch in-depth surveys or perform checks, based on random sampling or large-scale campaigns. To automate this due diligence and approval process, the Group's risk management and compliance department is developing a common tool for third-party due diligence with the support of the IT services department.

Furthermore, specific subcontractor, supplier and partner assessment procedures are applied for certain projects outside France that are tailored to the business line, the customers or countries concerned and the main risks identified.

Raising awareness among employees:

Eiffage endeavours to raise awareness to even higher levels about the imperative of respecting human rights by implementing selective measures targeting employees and communicating more about the reporting channels for alleged breaches.

Whistleblowing system (Eiffage integrity line).

Eiffage set up a whistleblowing system back in the late 2000s. In 2020, the system was enhanced with the launch of an outsourced whistleblowing platform enabling employees to report confidentially any concerns related to ethical misconduct, serious breaches of human rights, fundamental freedoms, environmental protection or health and safety. Following the transposition of the 2019 Whistleblowing Directive, the whistleblowing system was enhanced through the deployment of the digital platform to our entities outside France and the extension of the reporting capabilities to all Group employees and to external parties.

Monitoring of measures and their effectiveness:

Measures and their effectiveness are monitored at every level of the organisation.

By support services:

The various support services (human resources, risk prevention, legal affairs, purchasing, compliance) are involved in monitoring and controlling compliance with Eiffage's commitments to respect human rights;

By internal control:

Every year, internal control runs an internal control self-assessment campaign to raise employees' awareness of the procedures and rules they must follow. Among other areas, the questionnaire covers human rights issues. Key indicators have been created to monitor the risks identified and these are tracked regularly;

By internal audit:


As part of their duties, the internal auditors systematically look at control points concerning human rights, in line with their work programme based on the Group's unified risk guide. Should anomalies be detected during these audits, action plans are drawn up and the results monitored;

At our suppliers:

Our suppliers are audited to ensure they comply with the Group's duty of care obligations. Human rights aspects are among the points covered by these audits.

This declaration has been approved by Eiffage's Board of Directors.

Vélizy-Villacoublay, 7 December 2023



Benoît de Ruffray
Chairman and Chief Executive Officer