

Modern Slavery and Human Trafficking Statement

In the countries in which Eiffage operates, we are committed to respecting internationally recognized human rights and to combating modern slavery and human trafficking.

Our approach includes reference to the Universal declaration of human rights, the french duty of care Act 2017, the UK modern slavery act 2015, the european social taxonomy proposals, the United Nations Global Compact, the International Labour Organization (ILO) core conventions and the United Nations guiding principles on business and human rights.

The purpose of this statement is to remind our commitments and describe our approach to the fight against modern slavery.

On modern slavery and human trafficking

Modern slavery is a crime and a violation of basic human rights that takes various forms, such as forced and compulsory labour, non-payment of the minimum wage, the use of undocumented workers or children in production or distribution activities, and trafficking in human beings.

The risks associated with modern slavery and human trafficking can apply anywhere in our operations, whether through direct employment, subcontracting or the supply of goods and materials.

At Eiffage, we are determined to remain vigilant to ensure that our suppliers, contractors, subcontractors, and temporary employment agencies do not use a workforce that is a victim of modern slavery.

Our commitment against modern slavery

We are committed to fighting all forms of slavery and human trafficking.

Our commitment covers all people working for Eiffage worldwide, including those on secondment, subcontractors, suppliers, consultants, temporary workers, job applicants, people working for Eiffage through a third party and those who interact with us at any level.

For many years, Eiffage has had internal and external ethical rules that are applied by the stakeholders concerned, including, first and foremost, the Group's employees.

The values charter, which sets out the intangible principles that all employees must know and respect, was published in 2019 and translated into the main languages of the Group's subsidiaries abroad.

The six values have been reaffirmed and their content redefined:

- **Exemplarity**, whatever the circumstances, acting ethically, conscientiously and in strict

compliance with the rules;

- **Trust** all employees, between the Group's businesses and the relationship with stakeholders;
- **Responsibility**, each one being at his level the guarantor of the human and material resources entrusted to him;
- **Transparency**, with information given being reliable and comprehensive and transmitted promptly;
- **Lucidity** that brings the guarantee of achievable objectives and fulfilled commitments;
- **Courage and pugnacity**, values necessary to overcome periods of more moderate activity.

They are applied in all geographical locations and ensure compliance with the Group's international CSR commitments, including the fight against modern slavery.

All of the countries in which the Group operates have ratified the fundamental ILO conventions. Eiffage is therefore fully committed to respecting these rules: prohibition of forced labour (C29-C105) and child labour (C138-C182).

Furthermore, by joining the **Global Compact in 2005**, Eiffage committed to integrating, disseminating, and advancing the major principles of the UN. The Global Compact invites companies to adopt, support and apply within their sphere of influence a set of fundamental values in the areas of human rights, labour standards and the environment, and the fight against corruption.

Each year, the Group renews its commitment to the United Nations secretary general by detailing all the actions undertaken to achieve the objectives set in line with the Global Compact principles.

Analysis of our human rights and anti-slavery risks

Risks relating to human rights, fundamental freedoms, the environment, health and safety have been identified and assessed as part of the risk map specific to the duty of care. This mapping is updated every year and is presented to the Group's audit committee.

Eiffage operates mainly in France and Europe, where it has a high level of maturity and significant regulations regarding the protection of the environment, fundamental freedoms and personal health and safety, and a marginal percentage of sales in the rest of the world.

Based on the assessment, the risks of serious violations of human rights and fundamental freedoms of individuals that may result from the activities of the Group and its service providers are considered limited.

Our actions to respect human rights and fight modern slavery

Eiffage's commitment to respecting human rights is also reflected in the following procedures and mechanisms:

- **Vigilance plan:**
It was drawn up by the risk management and compliance department based on contributions from the sustainable development and transverse innovation department, the purchasing department, and the prevention-safety and human resources departments. It is updated annually and validated by the governance bodies, including the Group's audit committee.

- Our third-party assessment process:

At Eiffage, we pay particular attention to ensuring that our subcontractors, suppliers, and partners adhere to our high ethical standards of protection, promotion, and support with regard to human rights, including the fight against modern slavery or poor labour law practices.

The duties, responsibilities and legislative requirements of our supply chain apply to their own employees, their working conditions and those of their own supply chain and are set out in contractual clauses in contracts and general terms of purchase.

The evaluation of subcontractors, suppliers, and partners with whom there is an established commercial relationship is the subject of a "third-party evaluation procedure" included in the internal risk management guide, translated into several languages and accessible to all Group employees via the Eiffage intranet.

This procedure describes the practical arrangements for this evaluation and, in particular the content of the due diligence, the levels of control and the action to be taken according to the result of the evaluation.

In order to facilitate evaluations, the Group has equipped itself with tools offered by specialised service providers, enabling the launch of in-depth surveys or to carry out random or mass checks.

In addition, specific procedures for assessing subcontractors, suppliers and partners are implemented on certain international projects, with regard to the business line, client(s), and country(ies) concerned, or its main identified risks.

- Training of our employees:

Eiffage is committed to proactively increasing awareness of the signs of modern slavery and human trafficking by raising awareness among our employees and by strengthening information on channels for reporting suspected violations.

- Professional alert system (*Eiffage integrity line*):

Since the end of the 2000s, Eiffage has had a whistleblowing system. This was improved in 2020, with the introduction of an outsourced web platform for the confidential collection of any reports relating to business ethics, serious violations of human rights, fundamental freedoms, the environment, health and safety. The transposition of the European directive on the protection of whistleblowers in 2019 will lead to a new evolution of the whistleblowing system, with the implementation of the digital platform in our entities abroad, as well as the extension of the possibility of reporting to all the Group's employees and to external persons.

Governance of the fight against modern slavery

The duty of care requires cross-functional governance, given Eiffage's decentralized organization and the multitude of business lines that need to interact, particularly in decision-making.

- Global governance:

The Group Compliance Governance Committee regularly reviews the proper implementation of the Compliance Plan and decides on new actions to be taken;

- In the area of human rights and fundamental freedoms:

The human resources departments of the branches implement a policy of non-discrimination and respect for human rights and fundamental freedoms;

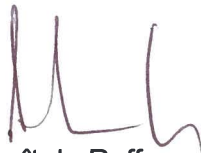
- In terms of responsible purchasing:

The holding company's purchasing department is implementing a responsible purchasing strategy and supplier evaluation procedures.

Our procurement, legal, human resources, risk, compliance, internal control and audit, and communications departments are also involved in ensuring the robustness of our measures to guard against modern slavery and human trafficking.

This statement has been approved by the board of directors of Eiffage.

Vélizy-Villacoublay, 08 December 2022



Benoît de Ruffray
Chairman & Chief Executive Officer

