



## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Company Approach

Vibro Menard Limited is part of the Soletanche Freyssinet Group, Vibro Menard is a design and build specialist geotechnical contractor offering expertise on ground improvement for sites with poor soil.

Vibro Menard Limited conducts projects in the UK and Ireland and can call upon the world wide resources of the group to offer cost effective, sustainable, safe, innovative, high quality ground improvement solutions to budget and on programme.

Vibro Menard Limited is also part of the VINCI Group of companies, one of the largest global built environment organisations. Being part of the same group lends itself to collaborative working, following similar procedures and having access to a global resource in terms of people, equipment, technology and common suppliers.

All group companies share a mutual code of ethics and conduct, the code is delivered by the Director 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.

Vibro Menard Limited takes its responsibility to avoid and mitigate any modern slavery in its operations extremely seriously. To that end we have developed a detailed policy and strategy that runs over 3 years to support this statement. Our approach to modern slavery shall be governed by our main board, who shall provide leadership from the top down, continually striving for best practice and leading by example. Our modern slavery policy will be communicated to our supply chain, embedded into our procurement policy and will become a part of the way we work.

### 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:

- Code of Ethics and Conduct

- Corporate Social Responsibility
- Anti-Bribery
- VINCI Manifesto
- Equality
- Recruitment and Selection
- Whistleblowing

We carry out Right to Work and Pre-Employment checks on all employees joining our organisation and this includes the employee being able to provide evidence that they are in possession of their own identification documents and that the bank account details provided belong to the employee and not a third party. Any discrepancies identified are investigated thoroughly and appropriate action taken.

We have internal procedures accessible to 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 staff 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 have in place annual reviews with the recruitment agency partners.

### 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, Vibro Menard Limited 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. Added additional language to its standard contractual terms with its suppliers and sub-contractors in relation to modern slavery.

Our policy and 3-year modern slavery strategy have been developed by the dedicated Modern Slavery Working Group. The working group works closely with the Supply Chain Sustainability School and works cooperatively with our peers to identify modern slavery risks within our supply chains as part of this process.

As is detailed in our 3 year strategy, some of the key actions we will look to 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. Further develop our standard contractual terms to enhance obligations in relation to modern slavery.
8. Join the United Nations Global Compact
9. Produce a supplier code of conduct
10. Produce an Ethical Procurement Policy

We will report on the success of the above actions in our 2018 statement as well as set the objectives for the following year.

This statement is made in accordance with Section 54 (1) of the UK Modern Slavery Act 2015 and constitutes Vibro Menard Limited Limited's Modern Slavery Statement for the financial year end 31<sup>st</sup> December 2016.

Philip Hines



Vibro Menard Limited

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