



CASE STUDY

UK Division of VINCI Construction

Enhancing modern slavery risk management

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Strengthening due diligence and risk mitigation in supply chains

The brief

- How mature is the UK division of VINCI Construction's current approach to managing modern slavery risks?
- How can existing policies and processes be improved to align with best practices?
- What frameworks and methodologies can be used to develop a robust strategy for managing modern slavery risk in the supply chain effectively?

The situation

Our client, the UK division of VINCI Construction, generates an annual turnover of approximately £2.5 billion and operates across highways term services, facilities management, construction, civil engineering, infrastructure and production.

Owing to the scale and complexity of these organisations, VINCI Construction manages a highly diverse portfolio of materials and labour across multiple geographies and supplier types. This poses modern slavery due diligence challenges typical of an industry that deals with long, complex, and sometimes opaque supply chains.

To check the validity of its approach to these challenges, and with increasing regulatory expectations and investor scrutiny, VINCI Construction recognised the need to assess its current risk management maturity and reinforce its approach to preventing modern slavery.



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Project deliverables



Comprehensive assessment of modern slavery risk management maturity



Prioritised recommendations tailored to VINCI Construction's business structure and risk exposure



Best-practice framework to guide process improvements and implementation



Strategic roadmap and actionable steps to embed modern slavery risk management into decision-making

How we helped

We began with an in-depth review of the contemporary risks, accepted frameworks and examples of best practice for managing modern slavery risk in construction.

In addition, we assessed the current state of VINCI Construction's policies and processes for managing modern slavery risks through a document review, interviews and focus groups.

To assess the maturity of VINCI Construction's approach, we also identified eight areas that are key steps in any risk management process, aligned with the UK Modern Slavery Act's mandatory reporting requirements and additional resources such as the Office of Independent Anti-Slavery Commissioner's Maturity Framework for Modern Slavery.

Each of the eight areas was given an impact score, measuring the severity of risk in case of poor performance, and a performance score, evaluating VINCI Construction's current

approach against best practice. Combining these, we created a priority score to highlight the most critical areas for improvement.

Using this analysis, we provided targeted recommendations, focusing on the highest-priority areas where maturity could be strengthened. We developed a roadmap for implementation, integrating strategic actions across the business and supply chain to drive meaningful progress.

Our approach was guided by the best-practice framework developed by NGO Stronger Together and the UN Guiding Principles on Business and Human Rights, ensuring alignment with global standards and stakeholder expectations.

"Sancroft's expertise has been key to helping us assess and enhance our approach to modern slavery risk management. The team's insights have provided us with a clear strategy to strengthen our processes and engage our supply chain. This work aligns with our commitment to being a responsible employer and will help us continue to manage this critical area robustly."

PAUL GOOSEY, MANAGING DIRECTOR, EUROVIA
(PART OF THE UK DIVISION OF VINCI CONSTRUCTION)



What VINCI Construction achieved

Through this process, VINCI Construction gained a comprehensive picture of its modern slavery risk management maturity. While its policies were robust and thorough, the implementation of processes varied across different business units and supply chain partners.

Our work highlighted the importance of prioritising process improvements over policy adjustments, ensuring stronger operational execution.

VINCI Construction now has a clear roadmap to allocate resources effectively, targeting the areas that will have the most significant impact. The insights have reinforced its ability to proactively address risks, safeguard vulnerable workers and meet stakeholder expectations. With this foundation in place, the company

is also well-positioned to demonstrate social value – a key factor in winning contracts in the public sector in particular.

Looking ahead, VINCI Construction will focus on improving awareness and training, particularly among on-the-ground teams and suppliers, ensuring its strong policies are actioned fully. By embedding modern slavery risk management into procurement and operational processes, the company is committed to maintaining human rights as a key area of long-term focus.

Key takeaways

- **A risk-based approach** ensures that resources are allocated effectively, prioritising the most vulnerable areas of the supply chain
- **Engagement with suppliers** fosters stronger relationships, upskills partners and enhances risk management capabilities
- **Awareness and training are crucial** – workers and suppliers must understand modern slavery risks and mitigation strategies
- **Implementation is key** – strong policies must be matched by effective processes to ensure real-world impact

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If you want to know how we can help strengthen your approach to modern slavery risk management, get in touch with Felix.Gummer@sancroft.com