

Mr. Ban Ki-Moon Secretary General United Nations New York 10017 United States of America

Vélizy Villacoublay, November 17<sup>th</sup>, 2015

## Communication on Progress (COP) EIFFAGE

Mr. Secretary General,

Please find enclosed the renewed commitment given by EIFFAGE Group to ensuring the implementation, dissemination and ongoing progress of the principles of the United Nations Global Compact in the Group's strategy and core activities.

Expressing the wish that a growing number of organizations and enterprises will adhere to these fundamental principles and thus reinforce the effectiveness of what is a finique initiative, I ask you, Mr. Secretary General, to accept the assurances of my highest consideration.

Max Roche

Encl.





# **EIFFAGE Communication on Progress (COP)**

*November 17<sup>th</sup>, 2015* 

In line with its corporate social responsibility and environmental policy, EIFFAGE joined the United Nations Global Compact as early as 2005 and has indicated to the Secretary General of the United Nations its renewed commitment every year since.

The present letter contains the formal, renewed commitment of EIFFAGE to support and to enact in its organization the ten principles of the United Nations Global Compact.

Since signing up to the Compact, the Group has systematically informed its employees, its business partners and its customers of this commitment, most notably through all of its publications (website, annual sustainable development reports, tender specifications to be met by subcontractors and suppliers). The EIFFAGE Group has translated the ten principles into practice in its Sustainable Development action plan, which has been rolled out across all its branches and is updated each year.

For 2014-2015, EIFFAGE has continued to communicate on the undertakings given to the United Nations and has once again set out in its Annual Report the Group's major initiatives harmonized with each of the principles of the Global Compact.

The following are, for this year, the flagship actions of EIFFAGE that reflect the principles of the Global Compact.

## **HUMAN RIGHTS**, PRINCIPLES N°1 & 2

#### A. VALUES AND COMMITMENTS

Promoting respect for customers and employees, and providing in-service training for craftsmen and managers are key pillars of Eiffage policy. Reducing the Group's ecological footprint is another major focus area.

The "Eiffage Charter of Values and Mission Statement", first introduced in 1991 and subsequently reiterated and enhanced in 2008, sets out the Group's intangible principles: customer satisfaction, respect for employees, exemplary behaviour by managers, transparency justifying tighter audit and inspection procedures, eradication of conflicts of interest, proper consideration for the expectations of Eiffage stakeholders such as partners, suppliers and subcontractors, public authorities, interest groups and local residents.

The Charter, which is distributed throughout all divisions and management tiers, with a copy issued to every new employee, promotes a clear-headed approach to the growth outlook for Eiffage and its markets, and encourages a bold and tenacious attitude during less busy periods.

It is now accessible on Eiffage website dedicated to sustainable actions within the Group: <a href="https://www.developpementdurable.eiffage.com/en">www.developpementdurable.eiffage.com/en</a>

The "Ethics and Commitments" guide gathers the following elements and informations :

- 1. Founding document produced in 1991, establishing a common baseline for all Group employees. The values described in the Charter, which were reiterated and enhanced in 2008, embody Eiffage's commitments to internal and external stakeholders,
- 2. Summary of Eiffage's sustainable development policy, which is reiterated each year in the Sustainable Development Annual Report,
- 3. Regulatory compliance (competition and insider trading, lobbying and influence), prevention of conflicts of interest (relationships with third parties, sponsorship policy, employees' public life), anti-corruption efforts (remuneration and gifts),
- 4. International labour standards, health and safety, anti-discrimination measures, non-use of offshoring practices, non-use of undeclared labour, child labour,
- 5. Purchasing policy, purchasing code of conduct, respect for subcontractors
- 6. Environmental policy (summary), GEODE software, "Biodiversity" and "Water and Aquatic Habitats" charters,
- 7. Global Compactn Carbon Disclosure Project, Bussiness and biodiversity offsets programme (BBOP), National Strategy for Biodiversity
- 8. Internal control, Whistleblowing, Scientific Council, voluntary ratings, verification of figures, consultation process.

## B. THE EMPLOYEE SHARE OWNERSHIP, PART OF EIFFAGE'S DNA

Since 1990, when the first management buyout (MBO) was staged, Eiffage has stood out in the French entrepreneurial landscape for being a trail-blazer in developing effective employee share ownership. All employees, from the craftsmen to the managers, have been seduced by this model, investing in the capital of their company to share in its performances and contribute to its long-term success:

• Eiffage is unusual in the scale of the Group's employee share ownership scheme. Employees in all job categories as well as managers together own 25% of the company's equity,

 more than 61,000 employees and former employees are Eiffage shareholders, a record for France. In 2014, despite the economic context, more than 34 000 employees bought shares worth a total of €103 million.

### C. RESPONSABLE PURCHASING POLICY

Purchasing managers ensure that relations established with suppliers are effective, balanced and transparent. This involves, notably, negotiating framework contracts validated by the legal department and ensuring compliance with the purchasing code of conduct which incorporates the 10 Global Compact principles and the 10 commitments of the mediation charter signed in 2010. An English version is being distributed to ensure greater awareness among European subsidiaries.



Over the past four years, Eiffage has been conducting a CSR assessment of its suppliers using the ACESIA platform, one of the sector's reference tools. The top priority in 2013 was to carry out a preliminary assessment of suppliers under framework contracts which entailed assessing 450 strategic suppliers. This remained the priority in 2014 and our purchasing teams therefore reassessed the same supplier base.

# D. FULL CIVIC ENGAGEMENT AT THE INTERNATIONAL SCALE : AN EXEMPLE WITH EIFFAGE SENEGAL

Eiffage Senegal, which signed up to the Senegal CSR and Sustainable Development Charter in 2012, has been assisting its employees and local people for many years, notably through logistic support for NGOs – such as its backing since 1995 for for *Le Kinkéliba*, an NGO which promotes medical development in rural areas. In 2014, the company helped with the renovation of the Dionewar Island healthcare centre and supplied medicines at its official opening.

For the past 10 years, Eiffage Senegal has been actively involved in efforts to prevent two problems still very prevalent in Africa: HIV/AIDS and occupational hazards. A partnership with the Senegalese National AIDS Prevention Council was formalised in 2012 by holding six informal discussion sessions

(known as chats) in a neighbourhood of Rufisque. These chats attracted total of 170 residents, including worksite staff, fishing organisations, a few associations including an organisation for seniors, well-known local figures and homemakers. As well as question-and-answer sessions, the chats featured practical information on STD transmission and prevention methods, distributions of female and male condoms, and personal accounts by people living with AIDS.

Since 2011, Eiffage Senegal and the Eiffage Foundation have been supporting the Nubian Vault association which aims to promote knowledge of the Nubian vault construction technique and teach it to people in Senegal's Podor department.

# LABOUR STANDARDS, PRINCIPLES N°3, 4, 5 ET 6

#### A. HIRING AND RETAINING

The divisions' recruitment strategies are based on ongoing programmes approved by their general managements. They involve:

- hiring more young people by diversifying recruitment sources and improving new employee orientation,
- making the recruitment process objective to ensure diversity and equal opportunity,
- fostering long-term employment through, for example, internal mobility,
- retaining and accommodating disabled and senior employees,
- hiring hard-to-place individuals by providing back-towork programmes.

## a. Promoting young graduates' integration

The company is using a wider range of methods to recruit candidates from more diverse backgrounds, with its strategy focused on supporting the Group as it adapts to change. Long-term shortages in certain occupations have required the divisions to provide more training programmes and seek new sources of candidates.

Through a variety of partnerships and forums, Eiffage seeks to form lasting ties with universities and top engineering schools and maintain relations between these institutions and the Eiffage managers they trained:

- group-level partnerships: École des Ponts et Chaussées, ESTP and Université de Paris I Panthéon-Sorbonne,
- division-level partnerships: École Centrale, INSA Lyon and Rennes, Supelec and Esigelec,
- search for university interns and graduates studying engineering disciplines required by the Group's businesses, in partnership with the "Interfaces et Compétences" association,
- career exploration and promotion programmes, with the divisions participating in a variety of events, including job fairs, worksite tours and career days.

## b. Offering equal opportunity

In line with the Eiffage Charter of Values and Mission Statement and the Group's official commitments, the divisions have all pledged to ensure diversity and equal opportunity during the recruitment process:

- offering job opportunities to young people from underprivileged neighbourhoods, hiring women for operational positions, and recruiting older and disabled employees are now the focus of targeted programmes and training for managers,
- adopted in 2009, the Group policy that proactively supports employing people with disabilities is
  regularly updated, and new initiatives continue to be launched. It seeks to change employee
  attitudes toward the disabled and promote conditions favourable to their hiring and retention,

Eiffage participates in the Disability & Skills Club whose purpose is to foster workplace integration and increase job retention for people with disabilities. The Club is currently examining the approaches to collaboration with the supported and sheltered sector, based on its members' practices. A guide is planned for 2015.

## c. Temporary employment

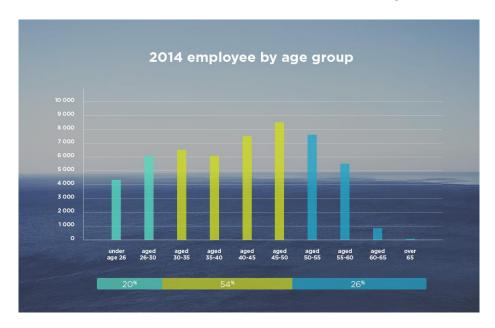
The divisions try to limit the use of temporary workers and regularly seek alternative solutions, such as internal transfers and organisational and planning efforts.

#### d. The path to employment

Eiffage complies with labour clauses in certain contracts that reserve a certain number of working hours for economically marginalised individuals and also takes additional measures, such as:

- proactive in-house policies,
  - the divisions actively cooperate year-round with local employment organisations serving disadvantaged populations and on a regular basis during major public procurement projects.
     As a result, the average number of hours reserved for marginalised workers on these important projects now exceeds 8%,
  - Eiffage has created in-house training programmes to provide qualification courses for young people struggling in school while tailoring instruction to the company's recruitment needs.
- support for related initiatives at Eiffage that foster commitment to social inclusion through employment,
  - the Group provides financial and logistical assistance to the CREPIs and their national federation. These clubs bring together regional companies that act in a volunteer capacity to help marginalised populations entering the workforce. In 2014, 4,986 people without employment were referred to the CREPI and 2,997 of them received specific support services,
  - social and work integration projects are a major priority of the Eiffage Foundation.

For the work begun in summer 2014 to extend line 14 of the Paris Metro, Eiffage Travaux Publics plans for some 45,000 hours, or more than 5% of the total number of production hours, to be devoted to integrating people without work. Specialised agencies such as Pôle Emploi, the Local Mission and the local integration and employment plan (PLIE) are contributing to this effort. At the same time, structures within the division – and in particular the Bernes-sur-Oise school – are called on to introduce and train the individuals recruited in the framework of integration schemes.



#### **B. RISK PREVENTION POLICY: CHANGING BEHAVIOUR**

Involving all levels of employees and giving priority to initiatives focusing on behavioural change, the divisions have all made strong commitments to safety in their action plans. These initiatives include training programmes, the sharing of best practices and investments in equipment providing the highest level of safety.

### a. Awareness campaign

Raising employees' awareness on an ongoing basis is a key success factor for risk prevention policies, and all divisions have ramped up their communication efforts:

- APRR and AREA continued their joint "We are all responsible for safety" campaign, launched in 2010, with a new version rolled out,
- Eiffage Travaux Publics rolled out its Safety is for life programme in the second half of 2014 around the values of solidarity, mutual assistance and Eiffage accountability. Initiated with a Silence Kills poster campaign, followed by a second campaign titled Talking Saves, the national risk prevention operation named Live Life Safely highlighted the importance of team spirit and cooperation when it comes to safety. The operation culminated in a day of events organised in France, Germany, Spain and Senegal around this theme.

## b. Training for safety

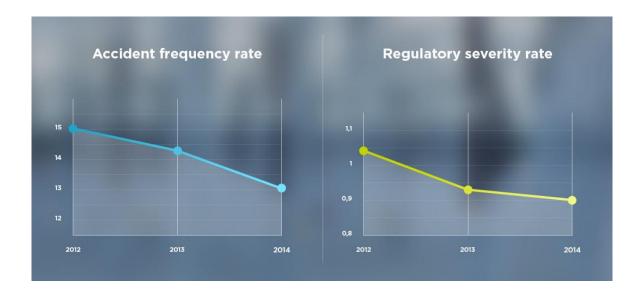
Professional safety training is mandatory for all employees. All of the Group's business units provide basic safety skills training and 15-minute safety sessions. New employees are introduced to safety guidelines through instructions, information sheets, employee handbooks or other orientation procedures. Every division has developed training processes devoted to safety in its core businesses. Temporary staff are subject to the same safety rules as employees and receive the same training and awareness courses, or courses developed specifically for them.

## c. Arduous work and psychosocial risks

In line with the various agreements signed and action plans developed by the divisions, stronger measures were included in the 2014-2015 prevention plans to reduce arduous work and fight stress and psychosocial risks:

- after action plans on the prevention of arduous work were signed in 2012, APRR-AREA and the
  Metal division conducted a series of ergonomic assessments of workstations to identify risk
  factors that could result in injury. Several recommendations by AREA's Toll Station Ergonomics
  Committee were implemented in 2013, including separating workstations by a partition to
  reduce noise from intercom interference and limiting workers to three night shifts in a row
  during their tours of duty. Eiffage Métal Construction and Eiffel Industrie signed collective
  agreements on this issue, the resulting measures, such as safety "chats" and PRAP training
  courses, arecurrently being rolled out,
- at Eiffage Travaux Publics, the arduous work agreement was implemented in early 2013, and the
  division created a monitoring committee in which all health and safety committees are
  participating,
- at Eiffage Énergie, the "arduous-work master plan" also comprises three focus areas: reduction
  of multiple exposures to workplace risk factors, as defined by law, skill and qualification
  development, and assistance with end-of-career issues,

- at Eiffage Construction, the arduous-work action plan combined all the best practices that had already been implemented. The plan generated a number of regional initiatives on physical warm-ups,
- concerning the fight against psychosocial risks, the divisions have, in particular, provided training as stipulated in the Group and industry-wide agreements.



#### C. TRAINING, ACTING RESPONSIBLY FOR THE BENEFIT OF US ALL

Continuing vocational training is an effective means of meeting employees' career development goals, improving their skills and expanding the Group's expertise, while retaining staff as well. By giving priority consideration to its own employees, the Group fosters their ongoing career development and "employability" regardless of their initial training.

## a. Eiffage University

The training system was extensively overhauled in 2014. The creation of the Eiffage University is the culmination of a process begun in 2013 and which illustrates the Group's desire to increase its competitive edge by enhancing employee skills to ensure their employability and versatility. The goal is to propose a clear, shared, internalised, streamlined offer that relies primarily on internal courses and trainers.

## b. Adapting to change

Annual guidelines determine the priorities for the training plans developed on the basis of the companies' strategic objectives and the needs expressed by employees and their managers. The results of a series of performance reviews contribute to the development of the training plans, with equal opportunity a key aspect of the training programme.

A wide range of efforts are involved in training worksite staff, from required safety training to skill enhancement, with courses leading to certificates being the divisions' preferred option.

New training courses have been or are being developed at Eiffage Énergie to transmit the trade basics and improve business line expertise. The goal is to design appropriate training to serve as genuine professional development courses. Operational and functional representatives in the regions are thus involved in the design of the new Eiffage University training courses.

The division also encourages geographic and functional mobility. The 2014 orientations targeted safety – a core objective –, adaptation of employees to trade and technology changes, performance management (business, work sites, projects) and professional development.

### c. Basic technical knowledge: the primary key to career advancement

Strengthening basic occupational skills is an essential prerequisite for career development, and the divisions organise appropriate training accordingly. Employees' ability to work internationally was also targeted by several divisions this year, via language courses or the identification of local specificities (legal business environment, etc.).

#### D. DIVERSITY: ESTABLISHED COMMITMENTS

In 1991, the first Eiffage Charter of Values established diversity as one of the Group's basic social principles. Twenty-two years later, the diversity commitment has been enriched with proactive strategies designed to promote equal opportunity for all, regardless of gender, age, national origin, religion, social class and health status.

Since 2010, the year of Eiffage's first Diversity & Equal Opportunity Action Plan (PADEC), the various agreements and action plans carried out by the divisions in response to Group commitments and regulatory changes are regularly updated, and new initiatives continue to be launched.

The Group continues to count on management training to foster a change in attitudes and disseminate best practices. Thus, in 2014, 23 managers took the Managing Diversity training course.

#### E. SOCIAL DIALOGUE EVER PRESENT

In France and the Group's countries of operation, staff representative bodies have been set up and operate in compliance with the regulations applicable in each country.

## a. European Works Council and Group Works Council

The memorandum of agreement on renewing the European Works Council, signed in March 2011 by Eiffage management and all of its trade unions, incorporated new EU rules from European Directive 2009/38/EC of 6 May 2009 into the agreement even before the directive was transposed into French law and laid down the principle of two meetings each year.

A Group Works Council, comprising 30 members appointed by the trade unions from among their elected representatives to the French subsidiaries' company-level and local works councils, was also created and meets twice a year.

## b. Psycho-social risk prevention agreement

A new agreement on the prevention of stress and psychosocial risks – covering all French subsidiaries except APRR and AREA, which have their own agreement – was signed in October 2014. As the signatories felt it appropriate to continue the approach begun in 2011, this agreement essentially extends the arrangements put in place by the previous agreement for a period of three years. Playing a key role in the programme, the health and safety committees track the indicators specified by the agreement on an annual basis. This gives a clearer picture of the risk conditions, enabling

difficult situations to be identified as early as possible. These committees have also designated from among their members an advisor trained in issues relating to stress and psychosocial risks.

## c. Health insurance expanded to include long-term care

In 2008, under the terms of a Group agreement, Eiffage set up a health insurance scheme that covers most of its subsidiaries. Also included is long-term care insurance for retiring employees and their spouses. This cover is based on a "accident-related death and disability" scheme that supplements the current insurance benefits plan. The agreement has been regularly amended to include new companies.

A mutual insurance monitoring committee, comprising management representatives and three representatives from each trade union, reviews all aspects of the scheme's management and operations, with support from a consulting firm. Independently of the negotiating meetings, it met twice in 2014.

# **ENVIRONMENT, PRINCIPLES N°7, 8 ET 9**

#### A. ENVIRONMENTAL POLICY WOVEN INTO THE GROUP'S CULTURE

The necessity of taking up the challenges of protecting the living world and the environment concerns all the Group's business activities.

For instance, a department with strong operational roots, the Sustainable Development department, is devoted to incorporating sustainability in tenders prepared by Eiffage as well as in its day-to-day activities. It also aims at anticipating the effects of climate change on the Group's businesses, channelled through the Phosphore sustainable development research programme. Phosphore is now responsible for developing new markets in the area of sustainable cities.

#### a. Two main pillars

- 1. Prevention and management of risks relating to environmental aspects of the Group's activities, with the twin aims of reducing our ecological footprint and preventing any financial or criminal risks or reputational damage. This is being achieved as follows:
- internally:
  - measuring impacts and optimising the Group's ecological and energy footprint through effective management of energy, water and raw material consumption, greenhouse gas emissions and project waste,
  - rolling out in-service training and certification programmes to promote excellence in the area of environmental issues,
  - rolling out ISO 14001 certification across all business units.
- through our business offerings:
  - developing and providing business units with operational tools that offer the customer a choice of green solutions with measured, verifiable impacts,
  - anticipating environmental risks in tendering processes and taking their technical and financial implications into consideration in the Group's proposals.
- 2. Focusing **R&D efforts on "alternative" construction techniques**, in particular by:
- centring R&D on techniques and processes that reduce natural resource consumption and greenhouse gas emissions, and minimise direct and diffuse environmental impacts,
- providing expertise in biodiversity preservation at all stages of the project cycle, based on applying the Avoid-Minimize-Offset strategy before submitting a project proposal, then during the site work and operational phases,
- anticipating the consequences of climate change for the Group's business lines (via the Phosphore forward-looking research project), in order to:
  - make a radical shift from current processes in favour of solutions suitable for post-carbon cities, making maximum use of renewable energy,
  - promote systemic requirement assessments and seek solutions that decompartmentalise urban planning topics, such as mobility, energy, new-build versus renovation considerations and urban ecosystem services.

## b. Commitment by top-tier management

General Management has clearly demonstrated its commitment to reducing the Group's ecological footprint, with universally-distributed documents that structure its activities:

### Internal policies

- funding charters defining Eiffage's position on issues such as "Biodiversity" and "Water and Aquatic Habitats", signed by the Chairman and distributed throughout all business units in the form of posters printed in several thousand copies,
- division-level policies signed by the respective Chairmen.

#### Voluntary commitments

- group commitments via the National Biodiversity Strategy (SNB) in 2012,
- member of the Carbon Disclosure Project since 2009,
- signatory of the Global Compact since 2005,
- corporate greenhouse gas emissions assessment in 2008 and 2012.

## c. A policy based on proven tools

## • Management and measurement,

- effective environmental management achieved by deploying environment management systems and sharing best practices,
- implementation of the GEODE operating environment management application development
  jointly by Eiffage and Red-On-Line; this software enables the Group's business units to handle
  environmental issues such as regulatory compliance and environmental analyses at their
  sites, waste management and emergency situations,
- energy efficiency and decreased greenhouse gas emissions: analysis and reduced consumption of resources, greater use of renewable energy, and special-purpose environmental comparators that help businesses to choose between technical solutions.

## Prevention and management of risks and impacts associated with activities,

- systematic environmental analyses at permanent sites and environmental analyses at work sites using the GEODE application,
- systematic training for environmental managers in Group companies, and regular employee awareness campaigns relating to environmental issues (in particular when employees begin working at project sites),
- particularly proactive biodiversity preservation strategy, including a postgraduate-level inservice training course in partnership with the University of Paris I, feedback on best practices, a "biodiversity pack" designed to assist biodiversity risk prevention, and a system to pool the Group's knowledge via a "Biodiversity document collection" containing studies of species.

#### B. A SUSTAINABLE CARBON POLICY

In 2008, Eiffage adopted a pioneering stance by transparently publishing the results of its first carbon assessment (scope 1, 2 & 3), which identified the main sources of emissions, enabling corrective action to be focussed accordingly.

The Group's greenhouse gas emissions assessment was published on 15 November 2012, using 2011 data processed in accordance with regulatory requirements. The same calculation method was used to assess emissions in 2014.

In 2011,

588 457 t eq CO2 of GHGs emited

In 2014,

579 713
t eq CO2 of GHGs
emited

-1,5%
Of GHGs emited

Eiffage operates a two-pronged carbon strategy that not only addresses internal issues but also engages with customers. Efforts focus on:

- measuring and reducing the carbon footprint of the Group's activities,
- harnessing greenhouse gas emission reductions as a competitive advantage.

# Avoiding emissions through a Carbon arbitration fund - the Bretagne Pays de la Loire high-speed rail link

Eiffage has developed a technical and economical tool the "carbon arbitration fund", a unique financial mechanism in France which allows to identify low carbon techniques and to finance the considered solutions.

Through the fund and the low-carbon solutions, the equivalent of 14 000 tonnes of CO₂ were avoided in 3 years, which could correspond to the construction of 2km of high speed rail.

## C. PRESERVING BIODIVERSITY, A ROLE FOR BUSINESSES

Given the difficulties to reach the global goals for the protection of biodiversity, we are required to redouble our efforts, and Eiffage reiterates its proactive stance. Eiffage acknowledges its responsibility with respect to the environment and is aware that the Group is itself exposed to risks associated with biodiversity erosion, including predicted scarcity of mineral and fossil resources, over-consumption in natural areas, and the multiple pressures exerted on water resources.

## a. Founding texts preserved for posterity

The "Biodiversity" and "Water and Aquatic Habitats" charters, signed by the Chairman and CEO of Eiffage in May 2009 and March 2011, respectively, are not only methods for taking biodiversity and water resource-related issues into consideration, but also help to focus the efforts of the Group's employees. These documents are freely accessible on the Eiffage website, and can be found in all of the Group's operational business units in France and elsewhere.

## b. Innovation, R&D and biodiversity-related training

Eiffage enhanced its support for research in many forms:

- Eiffage is continuing to raise awareness, provide training and support research to foster greater knowledge of ecological issues. Since the launch of the Bioterre Master's programme, in partnership with la Sorbonne. Acknowledged by the Ministry as part of the National strategy on biodiversity (SNB), it trains students and profesionnals to environmental issues within the context of major infrastructures and development projects. Twenty-six Eiffage students have graduated since the programme was created.
- In 2013, the corporate Sustainable Development department created an entertaining, interactive tool for raising staff awareness about biodiversity-related challenges. An online biodiversity quiz designed for all Group employees aims to raise awareness of the related challenges, risks and opportunities, explain the connections between biodiversity and the companies' businesses and identify possible measures. This tool is available to employees since early 2014.

### c. Knowledge sharing and cooperation with peers

The Group continued its work with environmental bodies, particularly through its involvement in task forces set up by the Orée association, the FNTP construction industry group and the MEDEF employers association. It is also a member of the CIL&B "linear infrastructure & biodiversity club", composed of leading managers of publicly and privately-owned linear infrastructures.

In 2015, Eiffage and its divisions had their commitment to the French national biodiversity strategy (SNB) in its full scope officially recognised for a second period, by France's Ministry for Ecology, Sustainable Development and Energy.

This strategy endorses the commitment of french government to the Convention on biological diversity which defines a coherent frame for all actors to deliberately contribute. In this perspective, Eiffage is the only actor from the public works sector to be recognised since the beginning of this approach. By renewing its triannual engagement, the Group continues its 2012-2015 programme which actions are still to be intensified.

On the international scene, at the BBOP world *No Net Loss Summit* in London in June 2014 – Eiffage having been a member of this organisation since late 2013 – the LGV Bretagne–Pays de la Loire rail link offsetting programme was put forward to show that early ecological offsetting can avoid excessive land consumption while preserving the efficacy and quality of all the offsetting measures adopted.

# **ANTI-CORRUPTION, PRINCIPLE N°10**

The whistle blowing system was put in place by the Board of Directors in April 2009 and authorised by CNIL, the French data protection authority, on 23 July 2009. The system enables Eiffage Group employees to report compliance and ethics-related problems (unfair competition, corruption or abuse of trust) on a confidential basis. No problems were reported in 2012.

The In-House Audit Department of the Group supervises the in-house control in accordance with the frame of reference defined by the AMF.

The audit assignments are organized by the Senior Management of the Group and carried out by the In-House Audit Department according to a program defined each year and presented to the Accounts Committee, which draws up its list of recommendations. It is supplemented by occasional assignments decided on during the course of the year.

To measure, manage and organize the sustainable development process within each entity and to ensure respect of the Global Compact principles, EIFFAGE is using since 8 years the Enablon software dedicated to the reporting of social and environmental performance. The results presented in the Sustainable Development Report 2014 had been assessed by KPMG consulting firm, which provided an attestation of disclosure and limited assurance report on Corporate Social Responsibility (CSR) information.

Page 7 of the "Ethics and Commitments" guide precisely refers to anti corruption methods: <a href="http://www.developpementdurable.eiffage.com/uploads/files/346167fd8fc3acc0b325bf3d2f128994.pdf">http://www.developpementdurable.eiffage.com/uploads/files/346167fd8fc3acc0b325bf3d2f128994.pdf</a>

The following table sets out the correspondences between the domains targeted by these indicators and the principles of the Global Compact.

Principles of the Global Compact			EIFFAGE response	Pages
Human rights	1	Support and respect the protection of internationally proclaimed human rights	Group values	228
			Social information / Employment – Labour relations – Health and safety – Training and education – Equal treatment	228 to 240
			Ethics & Commitments guide	Website
	2	Make sure not to be complicit in human rights abuses	Group values	228
			Ethics & Commitments guide	Website
Labour standards	3	Uphold freedom of association and the effective right to collective bargaining	Group values	228
			Social information / Labour relations	233
			Ethics & Commitments guide	Website
	4	Support the elimination of all forms of forced and compulsory labour	Group values	228
			Ethics & Commitments guide	Website
	5	Support the effective abolition of child labour	Group values	228
			Ethics & Commitments guide	Website
	6	Eliminate discrimination in respect of employment and occupation	Group values	228
			Social information / Employment – Labour relations – Health and safety – Training and education – Equal treatment	228 to 240
			Ethics & Commitments guide	Website
Environment	7	Support a precautionary approach to environmental challenges	Strategy / Building differently, strategy for sustainable development – Reducing our ecological footprint	94 to 103
			<b>Environmental information /</b> General policy – Conserving resources – Climate change – Protecting biodiversity	240 to 251
			Ethics & Commitments guide	Website
	8	Undertake initiatives to promote greater environmental responsibility	Strategy / Building differently, strategy for sustainable development – Reducing our ecological footprint / Preparing for the future	94 to 103
			Environmental information / General policy – Conserving resources – Climate change – Protecting biodiversity	240 to 251
			Information concerning social commitments in support of sustainable development / Relations with subcontractors and suppliers	253
			Ethics & Commitments guide	Website
	9	Encourage the development and diffusion of environmentally friendly technologies	Strategy / Building differently, strategy for sustainable development – Reducing our ecological footprint / Preparing for the future	94 to 103
			Environmental information / General policy – Conserving resources – Climate change – Protecting biodiversity	240 to 251
			Ethics & Commitments guide	Website
Anticorruption	10	Work against corruption in all its forms, including extortion and bribery	Information concerning social commitments in support of sustainable development / Fair business practices	253
			Ethics & Commitments guide	Website

## Check

# 2014 Eiffage annual report at:

# Eiffage website for sustainability:

www.developpementdurable.eiffage.com/en