



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

VINCI Energies UK and RoI

2021

Group Overview:

VINCI Energies UK Holding Limited and its subsidiaries which are listed below (“VE UK & Rol”) are a group of companies operating under the global VINCI Group, that contribute to a changing world by connecting infrastructure, buildings and industrial sites to information and energy systems to improve your life every day.

With locations in the United Kingdom and Republic of Ireland, VE UK & Rol employ over 1,185 employees across 27 Business Units delivering customised local solutions for each individual project, from the smallest to the most complex. Companies within VE UK & Rol began trading in the UK in 1907 and VINCI Energies has had a presence in the UK since 1991.

VE UK & Rol demonstrates its fields of expertise in three main brands; Actemium, Omexom and Axians. Actemium is dedicated to the industrial process, helping its clients to improve their competitive advantage and industrial performance. Omexom specialises in energy transition, from generation to transmission and distribution grids and the final consumer’s meter. Axians is the ICT brand of Vinci Energies that specialises in helping organisations to develop carrier-grade network connectivity that successfully delivers a better end-user experience

Although not Section 54 companies, VE UK & Rol have voluntarily complied with the provisions of the Modern Slavery Act 2015 and have produced this Modern Slavery and Human Trafficking Statement for the financial year ended 31st December 2020.

Policies and Procedures

VE UK & Rol are committed to complying with its obligations under the Modern Slavery Act 2015 and

other relevant legislation relating to the prevention and detection of modern slavery and human trafficking. VE UK & Rol are further committed to ensuring that effective controls are in place to ensure that modern slavery or human trafficking is not taking place anywhere in its business or its supply chains.

Within VE UK & Rol, the group is committed to ensuring transparency within each business and in its approach to tackle modern slavery and upholding human rights within its supply chain by expecting and requesting that the supply chain meets the same standards.

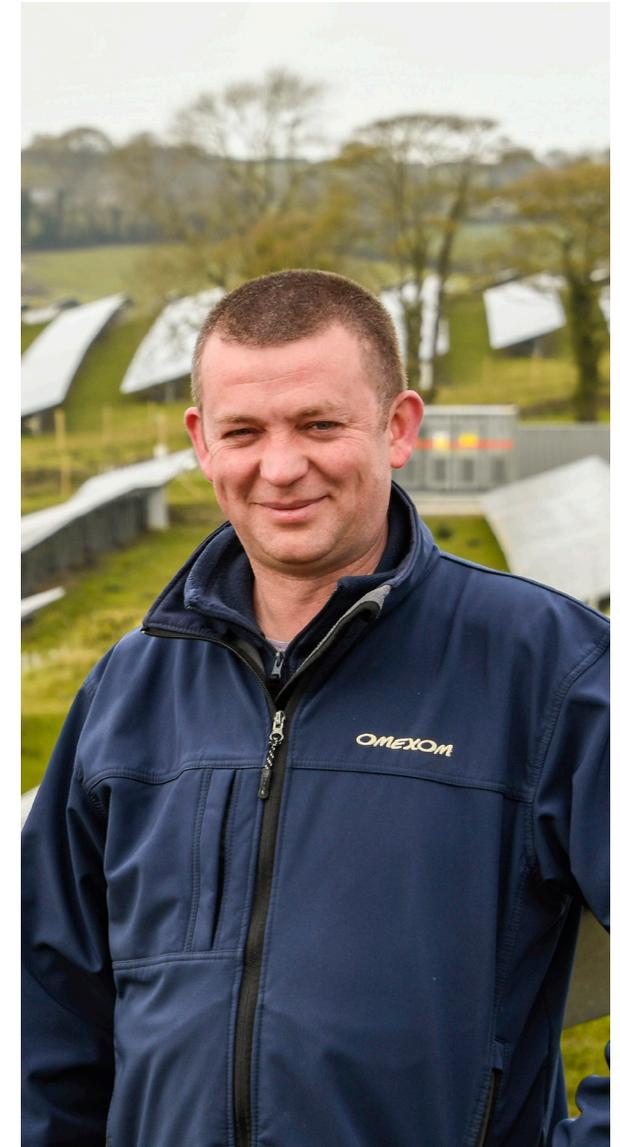
VE UK & Rol have policies in place which include, but are not limited to:

- VINCI Code of Ethics
- VINCI Guide on Human Rights
- VINCI Anti-Corruption Code of Conduct
- VINCI Manifesto

The VINCI Group continue to be a member of the United Nations Global Compact since 2003, voluntarily committed to comply with the 10 principles and communicating annually about the measures taken. In addition to the Global Compact, the VINCI Group and all its subsidiaries adhere to the following international standards:

- Universal Declaration of Human Rights (UDHR)
- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises

VE UK & Rol’s approach to modern slavery and human trafficking is governed by the board of directors who provide top down leadership in combatting all risks of modern slavery in our business.





Sourcing and Contractual Standards

VE UK & RoI adopt a risk-based approach in selecting and managing its supply chain. This includes reviews and risk mapping which includes risks relating specifically to modern slavery.

VE UK & RoI contract templates include contractual provisions which require suppliers, sub-contractors or other agents to comply with laws and regulations including the Modern Slavery Act 2015. Where existing contracts do not contain such provisions, VE UK & RoI will issue a questionnaire to each relevant supplier, sub-contractor or other agent to ensure that such standards are implemented within the supply chain.

Actions During the Financial Year Ending 31 December 2021

During the financial year ending 31 December 2020, VE UK & RoI took the following steps with the intention of further ensuring that modern slavery and human trafficking does not take place in its business or supply chains:

1. Third Party Management & Review

All new third parties who engage with VE UK & RoI are screened to ensure that contractual controls are in place as well as reviews for red flags. Regular third party management and review takes place at least annually to identify and ensure that third parties – including customers – are in compliance with laws related to modern slavery and human trafficking, including the VINCI codes listed above.

2. Employment Practices & Financial Controls

VE UK & RoI companies are aware of the responsibilities relating to recruitment and hiring. This includes ensuring payments to employees are made to a bona fide bank account and ensuring no cash payments are made. This applies to staff, fixed-term employees, temporary staff and contractors.

3. Sourcing Practices and Due Diligence

When goods or services are procured from third parties, VE UK & RoI undertake a risk assessment based which includes of the geographic indicators of modern slavery. A risk mapping exercise is done for each company and any mitigation steps are identified. During the financial year ending 31st December 2021, no issued have been identified within any VE UK & RoI company.

Moving Forward

VE UK & RoI is committed to promoting best practices and ensuring that all forms of modern slavery and human trafficking are eliminated in its business and its supply chain.

We are committed to:

- Develop training for staff to raise awareness of risk areas
- Continuing to promote best practices across the business and supply chain
- Improving procurement processes in order to vet existing and current suppliers

Approval

This statement is made with the approval of the Board of Directors of Vinci Energies UK & Rol on 31st March 2022 and is made in accordance with Section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2021 for the following entities:

VE UK & Rol Subsidiary	Registered Company Number
VINCI Energies UK Holding Limited	08804424
Actemium UK Limited	00065493
Actemium Design (North West Projects Limited)	02089134
Actemium Automation (Cougar Automation Limited)	02397024
Actemium Automation Nottingham (AND Automation Limited)	04446070
Actemium Automation Teesside (QSI Group Limited)	03698142
Omexom (Powell Engineering UK Limited)	03854782
Omexom (Kelvin Construction Company Limited)	07934819
Axians Networks Limited	04407184
Axians C&C (Nouveau Solutions Limited)	02699382

Scott Van Der Vord
CEO – Vinci Energies UK Holding Ltd

