

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT FY 2023

Introduction from the Board of Directors of Actemium UK Limited

It continues to be a priority for Actemium UK Limited, hereinafter Actemium, to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

Actemium adheres to and promotes key policies and guidance to ensure that anyone who works on its behalf is aware of the way in which Actemium does business which is to act responsibly and ethically.

The Actemium board of directors is committed to ensuring that Actemium is not only seen as an ethical business partner, but that it leads by example through championing its values. These values include integrity and responsibility as well as trust and empowerment.

This statement highlights the key activities we have undertaken during the financial year ending 31st December 2023 to combat modern slavery and human trafficking in our organisation and supply chain.

Our Organisation

Actemium is a brand of VINCI Energies dedicated to providing a range of safe, competitive and sustainable solutions to our customers using proven technical expertise with a sector-focused approach to produce effective services. We are a part of the VINCI Energies Group (VE Group), and our ultimate parent company is VINCI SA. VINCI SA has its head office in France. The Group has over 64,500 employees worldwide and operates in over 53 countries across the globe.

In 2023, the VE Group had over €19 billion in revenue. The global Actemium brand has 400 business units in 40 countries.

Our Business

Our business is organised into 8 business units who are experts that work to deliver a range of safe and sustainable solutions and services across the entire industrial lifecycle. In our day-to-day operations, Actemium builds on our powerful networking system expertise in each process to provide turnkey solutions. Additionally, We are also specialists in electrical and mechanical contracting and electric panels.

Our Policies on Slavery and Human Trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We also have the following policies and guidance in place relevant to modern slavery, which we continuously review and update:

- VINCI Manifesto – because VINCI projects are in the public interest, we consider that we have a duty to reach out to our partners to ensure that we work together to promote sustainability and comply with ethical principles.
- Code of Ethics and Conduct – applicable to anyone who works with the VINCI group, this code of conduct promotes trust, respect and mutual assistance.
- Guide on Human Rights – We have always prioritised people over systems. As such, this means working conditions, living conditions and recruitment practices must be transparent compliant with local and international standards.
- VINCI Anti-Corruption Code of Conduct – We have a zero-tolerance approach to corruption and bribery. Employees must behave irreproachably in terms of combatting corruption.
- United Nations Global Compact – the VINCI Group has voluntarily committed to complying with the 10 principles and reports annually on the measures taken by the VINCI Group.

Our People

We are a team of incredible people empowered to deliver the promise of the digital and energy revolutions. We have policies and initiatives in place to promote diversity and inclusion and equality.

We carry out pre-employment Right to Work checks to ensure that anyone working on our behalf and any discrepancies are thoroughly investigated.

Employees all have a contract of employment that sets out job responsibilities, pay and the expected hours of work. As part of our initiative to identify and mitigate risk we ensure that all staff are appropriately vetted and that all are paid via bona fide bank accounts and no payments made in cash

In the UK and Ireland, we have a whistleblowing policy and dedicated email address so employees can report any concerns of violations of business ethics, health and safety rules, environmental concerns and human rights policies. In addition, there is an international Integrity Platform which is hosted by the VINCI Group in France. Both the local and international platforms allow for reporting 24 hours per day and 7 days per week.

Training

Every employee is given access to training through face-to-face trainings and e-learnings on our VINCI Academy platform. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff on ethics and conduct and human rights.

Our Supply Chain

Our supply chain is an integral part of our delivery capability to our clients and in 2024, all our suppliers will be required to complete our Supplier Pre-Qualification Questionnaire (PQQ) which is hosted by Builders Profile. Suppliers must confirm that procedures and processes are in place to ensure compliance with their obligations under the Modern Slavery Act 2015 including records of any notice served upon it regarding the same. Such requirements flow down to the supplier's supply chain.

During the PQQ process, every supplier is requested to sign up to the following:

- Code of Ethics and Conduct
- Guidelines on Human Rights
- VINCI Manifesto
- Anti-corruption Code of Conduct

To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- Rigorous procurement standards and supplier onboarding
- Membership of the Procurement Skills Accord
- Annual review of top ten suppliers
- Ensuring clauses regarding modern slavery are included with third parties, including customers and suppliers

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal
- Human resources
- Finance

Due Diligence processes for Slavery and Human Trafficking

Having assessed the risk of modern slavery and human trafficking within our business, we have determined that the risk remains low.

We understand that the following areas give rise to the highest modern slavery risks:

- Working in the industrial sector
- Use of site operatives on client projects including unskilled labour
- Materials produced overseas

We also have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains

- Monitor potential risk areas in our supply chains
- Protect whistle blowers

Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Annual review of our suppliers via our Group Procurement department
- We received no reports of any indices of modern slavery in 2023 within our own business or our supply chain, and therefore no investigations or remedial activities were required

Planning ahead

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Training of employees
- Reviewing supplier onboarding processes
- Implementation of Builders Profile
- Ensuring contractual obligations are included in all our agreements

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2023. It was approved by the board of directors of Actemium UK Limited, on 6th April 2024