



VE UK & ROI - MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Vinci Energies UK & ROI Group anti-slavery and human trafficking statement for the financial year ended 31st December 2020.

Group Overview

Vinci Energies UK Holding Limited and its subsidiaries which are listed below (“VE UK & ROI”) are a group of companies operating under the worldwide 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 & ROI employ over 1,185 employees across 28 Business Units delivering customised local solutions for each individual project, from the smallest to the most complex.

VE UK & ROI are comprised of three 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 & ROI 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 & ROI 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 & ROI 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 & ROI, 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 & ROI 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 Energies UK Holding Limited
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- VINCI Manifesto

VINCI, which joined the United Nations Global Compact in 2003, has voluntarily committed to comply with the 10 principles and communicating annually in the measures taken. In addition to the Global Compact, VINCI 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

Sourcing & 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 2020

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 independent reviews via the Refinitiv Tool (Thomson Reuters). 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 in 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 2020, no issued have been identified within any VE UK & RoI company.

Approval

This statement is made with the approval of the Board of Directors of Vinci Energies UK & RoI 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 2020 for the following entities:

VE UK & RoI Subsidiary	Company Number
Actemium UK Limited	00065493
Powerteam Electrical Services (UK) Ltd t/a Omexom	NI034635
Axians Networks Limited	04407184

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Rochdi Ziyat
CEO – Vinci Energies UK Holding Ltd