

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Actemium UK Limited
Financial Year 2024



ABB

Introduction from the Board of Directors of Actemium UK Limited

This statement highlights the key activities we have undertaken during the financial year ending 31st December 2024 to combat modern slavery and human trafficking in our organisation and supply chain.

Actemium UK Limited places people at the heart of our business and we make it a priority to trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our business and our supply chain.

Actemium promotes and adheres to 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 responsibility and trust.

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. The global Actemium brand has 440 business units in 40 countries and in 2024, had €4 billion in revenue.

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. VINCI SA employs over 280,000 in more than 120 countries.

In 2024, the VE Group had over €20,4 billion in revenue, with 2,100 business units, employing 102,600 employees.

Our Business

Actemium in the UK is organised into 10 business units and employs more than 620 employees that work to deliver a range of services across a wide variety of market sectors. With an embedded culture of transparency and encouragement to think like our customers, we provide safe, reliable and sustainable solutions. 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 contracting and electric panels.

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 Right to Work checks and pre-employment checks on all employees that helps us to verify that employees have the right documentation in their possession and a bona fide bank account in their own name. 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 are 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.

Our Supply Chain

Our supply chain is an integral part of our delivery capability to our clients and in 2024, we have been preparing for all our suppliers 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 should flow down to the supplier’s supply chain.

In 2025, we will implement an online third party screening tool called THEMIS which will be used to screen companies, their beneficial owners and officers for adverse information relating to business ethics, human rights and health and safety.

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;
- Annual review of top ten suppliers; and
- Ensuring clauses regarding modern slavery are included with third parties, including customers, subcontractors and suppliers.

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

- Legal
- Human resources
- Finance

Our Policies

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 and 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; and

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.

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.

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;
- Working in countries which are determined to have a higher risk of human rights violations than the UK; and
- 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; and
- 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;
- Annual country risk assessments and third party risk reviews;
- We received no reports of any incidents of modern slavery in 2024 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 in 2025:

- Training of employees;
- Reviewing supplier onboarding processes;
- Implementation of the THEMIS third party screening platform;
- Implementation of Builders Profile; and
- 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 Modern Slavery and Human Trafficking Statement for the financial year ending 31st December 2024. It was approved by the board of directors of Actemium UK Limited, on 17th March 2025.



Andrew Hunter

Director - Actemium

