MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

VINCI Energies UK and RoI

Financial Year 2025

This Modern Slavery and Human Trafficking Statement sets out the framework that VINCI Energies UK Holding Limited and its subsidiaries listed below (together "VE UK & RoI") uses to prevent slavery and human trafficking in all forms.

This statement sets out the activities we have undertaken during the financial year ending 31st December 2025.

Group Overview

VE UK & RoI is a group of companies operating under the global VINCI Group, that contributes to a changing world by connecting infrastructure, buildings and industrial sites to information and energy systems to improve your life every day. The VINCI Group is a global player in the construction, energy and concessions sectors and operates in over 120 countries and employs over 280,000 employees.

Whilst the companies operating as part of VE UK & RoI are not required to produce a Modern Slavery and Human Trafficking Statement under Section 54 of the Modern Slavery Act 2015, we are making this voluntary statement as evidence of our commitment to ethical trading principles and to set out the steps we take to identify risks and tackle modern slavery and human trafficking in our businesses and supply chains.

With locations in the United Kingdom and Republic of Ireland, VE UK & RoI employs over 1,500 employees across 41 business units delivering customised local solutions for each individual project, from the smallest to the most complex. Companies within VE UK & RoI began trading in the UK in 1907 and VINCI Energies has had a presence in the UK since 1991.

VE UK & RoI 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.

Policies and Procedures

VE UK & RoI is committed to complying with the Modern Slavery Act 2015 and other relevant legislation relating to the prevention and detection of modern slavery and human trafficking. VE UK & RoI is 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 and Conduct
- Guide on Human Rights
- Anti-Corruption Code of Conduct
- VINCI Manifesto

The VINCI Group continues 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 & RoI'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 & Contractual Standards

VE UK & RoI adopts a risk-based approach to the selection and management of its supply chain, incorporating third-party due diligence, risk mapping, and targeted assessments of modern slavery risks.

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, there is a questionnaire available to send to the relevant supplier, sub-contractor or other agent to ensure that such standards are implemented within the supply chain.

Whistleblowing & Reporting

VE UK & RoI has a dedicated programme for employees to notify any concerns they may have regarding business ethics, human rights, environmental, health and safety issues and sexual harassment. Employees may report concerns at any time via email to a dedicated email address. The wider VINCI group has a platform which allows for anonymous reports for internal employees.

Actions During the Financial Year Ending 31 December 2025

During the financial year ending 31st December 2025, VE UK & RoI took the following steps with the intention of confirming 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 any red flags. Regular third-party management and reviews take place (at least annually and during the on-boarding process) to identify and ensure that third parties are in compliance with laws related to modern slavery and human trafficking, including the VINCI codes listed above.

In addition, throughout 2025 we have used a third-party screening tool, THEMIS, that screens companies, their shareholders and officers for violations of business ethics, human rights and health and safety breaches.

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.

E-learning is cascaded to employees within VE UK & RoI to reinforce the guidelines and principles in our policies.

3) Training

Every employee is given access to training 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, anti-corruption and human rights.

4) Supply Chain Practices and Due Diligence

When goods or services are procured from third parties, VE UK & RoI undertake a risk assessment-based approach which includes the geographic indicators of modern slavery. A risk mapping exercise is done for each company where any risks and if applicable, mitigation measures are identified. During the financial year ending 31st December 2025, no issues 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:

- Training staff to raise awareness of risk areas
- Continuing to promote best practices across the business and supply chain
- Continuing the use of the third-party monitoring tool across the business

Approval

This statement is made with the approval of the Board of Directors of VINCI Energies UK & RoI on 23rd June 2026 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 31st December 2025 for the following entities:

VE UK & RoI Subsidiary	Registered Company Number
VINCI Energies UK Holding Limited	08804424
Novo Technologies Ltd	10305880
NorPower Limited (t/a Omexom Overhead Line Services)	SC258471
Harries Automation & Control Limited (t/a Actemium Switcgear)	03047241
Eltek Systems Limited (t/a Actemium Automation Peterborough)	01691497
Kigtek Solutions Limited	SC349224
North West Projects Limited (t/a Actemium Design)	02089134
Cougar Automation Limited (t/a Actemium Automation)	02397024
AND Automation Limited (t/a Actemium Automation Nottingham)	04446070
QSI Group Limited (t/a Actemium Automation Teeside)	03698142
Kelvin Construction Company Limited	07934819
Axians Networks Limited	04407184

Scott Van Der Vord

CEO - VINCI Energies UK Holding Ltd