



# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FINANCIAL YEAR ENDING 31 DECEMBER 2025

Actemium UK

# INTRODUCTION

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FINANCIAL YEAR ENDING 31 DECEMBER 2025

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Actemium UK Limited (“Actemium”, “we”, “us” and “our”) for the financial year ending 31 December 2025. It describes the steps we have taken during the year to prevent modern slavery and human trafficking in our own operations and supply chains.

Modern slavery is a serious violation of fundamental human rights and includes slavery, servitude, forced or compulsory labour and human trafficking. Actemium has a zero-tolerance approach to modern slavery and is committed to conducting business ethically, responsibly and with integrity. We expect the same standards from our employees, workers, subcontractors, suppliers and business partners.



## ORGANISATION STRUCTURE, BUSINESS AND SUPPLY CHAINS

Actemium is a brand of VINCI Energies operating in the United Kingdom and providing multi-disciplinary engineering and industrial services. Our operations are delivered through specialised business units that support customers across industrial, infrastructure and energy sectors, including electrical contracting, control systems, automation, panel manufacture and turnkey engineering solutions.

Actemium forms part of the VINCI Energies group, whose ultimate parent company is VINCI SA. The Actemium brand operates through more than 440 business units in 40 countries and generated approximately €4 billion in revenue in 2024. In 2024, the VINCI Energies group operated through approximately 2,100 business units, employed approximately 102,600 people and generated approximately €20.4 billion in revenue.

In the UK, Actemium is organised into 8 business units and employs over 250 employees. Our workforce is supported by a supply chain that includes subcontracted labour, equipment and materials providers, and professional and corporate service partners.

Whilst the majority of our activities are UK-based, we recognise that modern slavery risks may arise in our own operations and supply chain where work is labour-intensive, involves temporary, agency or migrant labour, depends on subcontracting chains, or involves materials or services sourced from higher-risk sectors or jurisdictions.

Actemium’s supply chain supports the delivery of engineering and industrial services and includes construction and engineering subcontractors, labour agencies and contingent workforce providers, equipment and materials suppliers, logistics providers, and professional services providers.

The areas that are at heightened risk include site-based project delivery, the use of site operatives and lower-skilled labour, third-party labour providers, complex or lower-tier subcontracting arrangements, materials produced overseas and work connected to countries with a higher risk of human rights violations.



## GOVERNANCE AND ACCOUNTABILITY

The Board of Directors has overall responsibility for this statement and for oversight of Actemium’s approach to managing modern slavery risk. Day-to-day responsibility is supported by senior management and relevant functional teams, including legal, human resources, commercial, procurement and finance.

Modern slavery risk is managed as part of our broader ethics, human rights and compliance framework. Senior management receives periodic reporting on supplier risk profiling, due diligence outcomes, training completion, awareness activity and issues raised through reporting mechanisms. Material concerns are escalated through the appropriate governance channels and, where necessary, to the Board so that timely decisions can be taken on investigation, remediation and supplier management.

## POLICIES AND GOVERNANCE FRAMEWORK

Our commitment to ethical business practices is underpinned by a group-wide framework of policies, standards and guidance. These include the VINCI Code of Ethics & Conduct, the VINCI Guide on Human Rights, the VINCI Anti-Corruption Code of Conduct, the VINCI Manifesto, Actemium’s Anti-Slavery Policy, the Whistleblowing Policy, and relevant employment, recruitment, procurement and compliance procedures.

These policies establish clear expectations for employees and third parties and support compliance with applicable employment, labour and human rights laws. They prohibit forced,

bonded or compulsory labour, human trafficking, child labour and other exploitative practices, and encourage the reporting of concerns without fear of retaliation.

Contractual provisions with suppliers reinforce these standards by requiring suppliers to comply with applicable labour and human rights laws, maintain appropriate employment practices, prohibit forced, bonded or compulsory labour, flow relevant requirements down through their own supply chains where appropriate, and cooperate with information requests, audits and remediation actions where required.

## DUE DILIGENCE PROCESS

Actemium applies a proportionate, risk-based approach to due diligence as part of its wider ESG, ethics and compliance framework. The level of due diligence applied is informed by the nature of the supplier relationship, the risk profile of the goods or services being provided, the location of performance or sourcing, the extent of subcontracting, and the supplier’s own policies and controls.

In our own workforce, we conduct right to work and pre-employment checks and require employees to have written contracts of employment setting out job responsibilities, pay and expected working hours. We also seek to verify that employees are paid through bona fide bank accounts in their own names and that no payments are made in cash.

For suppliers and subcontractors, key controls include onboarding checks, pre-qualification assessments, modern slavery compliance questions, contractual requirements, ongoing monitoring, periodic review and escalation of issues through internal reporting channels. Suppliers are expected to confirm that procedures and processes are in place to support compliance with the Modern Slavery Act 2015

and that relevant requirements are flowed down through their own supply chains where appropriate.

A key control within our supply chain management framework is the use of third-party risk and sanctions screening. In 2025, Actemium deployed a platform to screen companies, beneficial owners, officers and other relevant parties for adverse information relating to business ethics, human rights, health and safety, sanctions and other risk indicators. This supports early identification of adverse media and other red flags and enables ongoing monitoring of suppliers over time.

As part of this process, Actemium conducts annual screening of key suppliers, including the top 10 suppliers and top 5 subcontractors within each business unit. Where due diligence identifies potential indicators of modern slavery or other human rights concerns, Actemium may require further information, impose corrective actions, carry out enhanced review, suspend onboarding, review the commercial relationship, terminate the relationship where appropriate, or escalate the matter for senior management consideration.



## RISK ASSESSMENT AND MANAGEMENT

We adopt a structured approach to identifying and mitigating modern slavery risks. Our assessment is that the risk of modern slavery in our directly employed UK workforce is lower, given our recruitment controls, right to work checks, written employment terms and payroll controls. We recognise, however, that risk may be higher in parts of our supply chain and project delivery model, particularly where work involves temporary, agency or migrant labour, site operatives, lower-skilled labour, overseas materials, complex subcontracting chains, third-party labour providers, or countries with a higher risk of human rights violations.

To mitigate these risks, Actemium implements enhanced due diligence for higher-risk suppliers, periodic risk mapping across the business units, contractual protections, supplier pre-qualification, third-party screening, and escalation and reporting procedures for identified concerns. We also seek to ensure that relevant commercial, procurement and operational teams understand the indicators of forced labour and know how to respond where concerns arise.

In 2025, the risk mapping indicated that Actemium business units net risk remains low.

## TRAINING AND AWARENESS

Modern slavery awareness forms part of Actemium's broader compliance and ethics training programme. Training is intended to help employees understand what modern slavery is, how it may arise in business and supply chains, the indicators of potential exploitation, and how to report concerns.

During 2025, relevant employees completed mandatory compliance and ethics training, with Actemium achieving a 95% completion rate across the business. Procurement, commercial and operational teams received

targeted training on identifying and escalating modern slavery risks, including risk indicators associated with labour providers, subcontracting chains, recruitment fees, retention of identity documents, wage deductions, excessive working hours and restrictions on freedom of movement.

In addition, employees are given access to face-to-face training and e-learning through the VINCI Academy platform, including ethics, conduct, human rights and modern slavery content.

## REPORTING CONCERNS AND REMEDIATION

Actemium provides confidential reporting channels through its whistleblowing framework, enabling employees, workers and other stakeholders to raise concerns safely and without fear of retaliation.

Our whistleblowing arrangements are a key control in identifying potential modern slavery risks, particularly within complex supply chains where issues may otherwise remain hidden. Reported concerns are assessed, investigated and escalated as appropriate, and remedial actions are taken where required.

Remediation may include engagement with the relevant supplier, corrective action plans, support for affected individuals, suspension of work, termination of the relationship, or reporting to relevant authorities where appropriate.

During the reporting period, no concerns relating to modern slavery or labour exploitation were reported through Actemium's reporting channels.





## MEASURING EFFECTIVENESS

Actemium monitors the effectiveness of its approach through key performance indicators that are intended to assess both activity and outcomes. These include completion rates for ethics, human rights and modern slavery training, the proportion of suppliers subject to onboarding due diligence, the number of suppliers screened or reviewed, the number of suppliers identified as higher risk, the number of enhanced reviews or audits completed, the

number and nature of concerns raised relating to employment practices, the timeliness and completion of corrective actions, and the extent of senior management or Board review.

These outcomes are reviewed periodically to inform improvements to our control framework. For 2025, Actemium achieved a 95% completion rate for mandatory compliance and ethics training.

## CONTINUOUS IMPROVEMENT

Actemium recognises that modern slavery risks continue to evolve and that ongoing improvement is essential. During the reporting period, Actemium enhanced supplier due diligence processes, increased training coverage and operational awareness, and strengthened the visibility and accessibility of whistleblowing channels.

In the next financial year, Actemium intends to continue strengthening supplier risk assessment during onboarding, improve consistency of contractual standards across supplier categories, enhance reporting and Board-level oversight of modern slavery risks, further develop measurable indicators to assess the effectiveness of its modern slavery controls, and review the effectiveness of its third-party screening and supplier pre-qualification processes.

## APPROVAL AND PUBLICATION

This statement has been approved by the Board of Directors of Actemium UK Limited on 19th June 2026 and signed by a director on behalf of the Board.

Actemium will publish this statement on its website and include a prominent link to it from the homepage. The statement should be published as soon as reasonably practicable after the end of the financial year and within six months of the financial year end.



**Andrew Hunter**  
Perimeter Director, Actemium UK



**NEED FURTHER INFORMATION?**

T: +44 (0) 121 717 1831

E: [reachout@actemium.co.uk](mailto:reachout@actemium.co.uk)

in [@Actemium\\_UK](#)

[www.actemium.co.uk](http://www.actemium.co.uk)