



Modern Slavery Statement 2025

VINCI Energies Australia

ACN 602 042 339

1. Purpose

VINCI Energies Australia Pty Ltd ACN 602 042 339 (**VEA**) has prepared a Modern Slavery Statement in accordance with its obligations under the *Modern Slavery Act 2018* (Cth) (the **Act**).

VEA’s registered office is located at 1/8 Weddell Court, Laverton North, Victoria.

VEA is a reporting entity under the Act, having consolidated revenue exceeding \$100 million.

Consistent with VEA’s financial reporting period, this Statement addresses the reporting period from 1 January 2025 to 31 December 2025.

This Statement has been prepared in consultation with the entities owned or controlled by VEA, as described below.

2. Our Business, Structure & Ethos

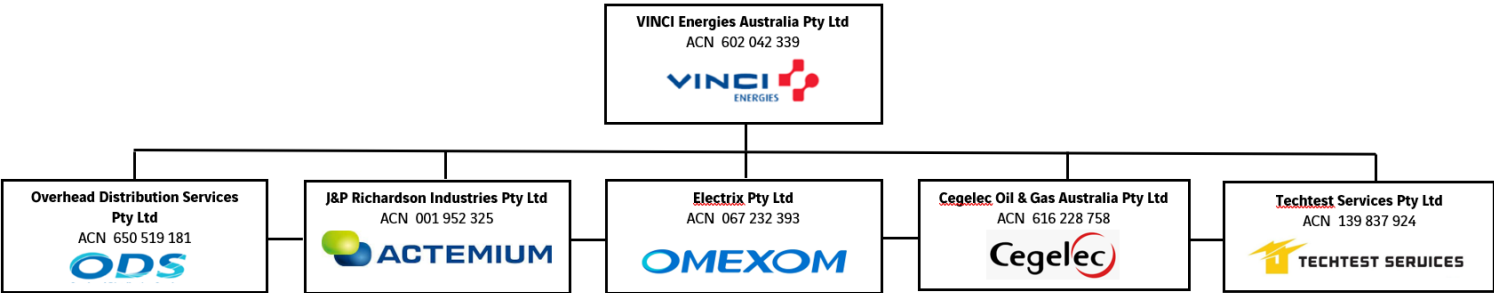
2.1 VINCI Energies – Parent Company

VEA is owned and operated by its French parent company VINCI SA. Whilst predominantly based in Europe, VINCI has a large global presence in the construction, digital transformation and energy transition space, across infrastructure, industry, the service sector and IT. At a global level VINCI is committed to innovation and service delivery to ensure its customers can operate in a more efficient, safe, reliable and sustainable way.

VEA and its subsidiaries hold a similar commitment, which includes the reduction and management of Modern Slavery risks.

2.2 VINCI Energies Australia Pty Ltd

VEA is not in itself an operating company, but the parent of five subsidiaries in Australia, J&P Richardson Industries Pty Ltd ACN 001 952 325 trading as Actemium (**Actemium**), Electrix Pty Ltd ACN 067 232 393 trading as Omexom Australia (**Omexom**), Overhead Distribution Services Pty Ltd ACN 650 519 181 (**ODS**), Cegelec Oil & Gas Australia Pty Ltd ACN 616 228 758 (**Cegelec**) and Techtest Services Pty Ltd ACN 139 837 924 (**Techtest**) (**VEA Businesses**).



2.3 Omexom

Omexom is a wholly owned subsidiary of VEA and a leading provider of engineering, construction, maintenance and smart energy management to major asset owners in the industrial, infrastructure, commercial and resource sectors within Australia, predominantly focused in Victoria and the ACT.

2.4 Actemium

Actemium is a wholly owned subsidiary of VEA and is one of Australia’s longest established electrical contracting and engineering businesses, offering design, construct and whole of asset life industrial scale electrical services to utilities, private industrial companies and developers. Actemium is primarily based in Queensland but offers services Australia wide.

2.5 ODS

ODS operates in the overhead and underground electricity distribution space, operating primarily in Queensland. ODS has recently joined the Omexom brand, who is known and recognised globally for its expertise in designing, building and maintaining energy systems.

2.6 Cegelec

Cegelec is a wholly owned subsidiary of VEA and operates in the Oil & Gas market in Australia since 2016. Cegelec offers services in the maintenance and commissioning of LNG installations in Northern Territory and Western Australia. During the reporting period, Cegelec undertook limited operational activities.

2.7 Techtest

Techtest is a wholly owned subsidiary of VEA and operates in the high voltage and substations construction space. Techtest is based in Victoria.

2.8 Broad Customer Base

Actemium, ODS, Omexom, Cegelec and Techtest have a diverse customer base, across a broad geographical area and a wide range of industries.

Customers Include:

Electricity Grid Owners (Public & Private)
Utilities
Private Companies
Developers
Local Authorities (i.e. Councils)
Road & Water

Markets Include:

Air
Food & Beverage
Mines & Quarries
Renewables
Electric Power Transmission & Distribution
Rail
Oil & Gas

2.9 Workforce

Actemium, ODS, Omexom, Cegelec and Techtest have a combined workforce of approximately 596 employees. Our employees are diverse in respect to age, qualification, skill level, gender, cultural background, religious beliefs and more. We believe this diversity makes our organisation stronger, more adaptable and

more cognizant of our obligations to act fairly, transparently and ethically in the marketplace. We are proud of our diverse, loyal and longstanding workforce.

The work performed by Actemium, ODS, Omexom, Cegelec and Techtest is Australia based, with some travel required across State borders from time to time.

2.10 Ethos

Actemium, ODS, Omexom, Cegelec and Techtest operate in alignment with the shared values and ethical framework established across the VINCI group globally. These values guide not only internal operations, but also interactions with employees, customers, subcontractors and suppliers.

At a global level, VINCI is committed to conducting its business activities responsibly and in the public interest, with a strong emphasis on human rights, ethical conduct, health and safety, and environmental sustainability. These commitments are embedded through group-wide frameworks including the VINCI Manifesto and the Guide on Human Rights.

The VINCI Manifesto sets out overarching commitments relating to compliance with ethical principles, environmental transition, workplace safety, diversity and inclusion, and responsible business conduct. Complementing this, the Guide on Human Rights articulates VINCI's position on key areas directly relevant to modern slavery risks, including:

- labour migration and recruitment practices;
- working conditions;
- living conditions;
- human rights practices within the value chain; and
- engagement with local communities.

These frameworks inform the policies and procedures implemented across VEA and its subsidiaries. Each entity maintains a range of governance and compliance measures designed to support ethical and lawful operations, including policies relating to:

- recruitment and employment practices (including verification of work rights and appropriate remuneration arrangements);
- health and safety systems and procedures;
- equal opportunity and anti-discrimination;
- modern slavery;
- subcontractor and supplier prequalification;
- code of conduct; and
- whistleblower protections.

These policies apply not only to employees but also extend, where relevant, to subcontractors and suppliers engaged by the business.

VEA considers that the consistent application of these frameworks, supported by training, oversight and management accountability, assists its subsidiaries to identify, assess and manage risks associated with modern slavery and broader human rights issues.

VEA recognises that modern slavery, including practices such as forced labour, servitude, human trafficking, debt bondage and deceptive recruitment, can occur across all industries and jurisdictions. Accordingly, while VEA and its subsidiaries operate predominantly within Australia under established

regulatory frameworks, modern slavery risks may still arise within their operations and, in particular, their supply chains.

VEA and its subsidiaries are committed to the ongoing identification, assessment and mitigation of these risks through the implementation of policies, due diligence processes and monitoring mechanisms. VEA acknowledges that modern slavery risks cannot be entirely eliminated and requires continuous review, vigilance and improvement across its operations and value chain.

3. Our Supply Chains

From time to time, Actemium, ODS, Omexom, Cegelec and Techtest procure goods and services and engage subcontractors to support their operations. While procurement volumes and subcontracting activity are relatively limited, the VEA businesses recognise the importance of maintaining oversight of supply chain practices.

The VEA Businesses procure goods and services across the following broad categories:

Category	Description
Business Support	Office equipment, office supplies, IT infrastructure and equipment, telecommunications, cleaning services & supplies, catering services, insurances, travel & accommodation, rent & property management.
Services Support	Motor vehicle maintenance parts & other items, PPE & other protective or safety equipment, training.
Equipment	Motor Vehicles, Heavy Vehicles, Forklifts, machinery generally, power tools, hand tools, pumps, testing equipment & software, sheet metal, paints, resins.
Parts, Materials & Electronics	Cables, wiring, conduits, casings, electrical components, circuits, concrete, light poles, lights, bulbs.
Subcontractors	Plant hire, specialised skill hire, traffic management, civil works.

While the VEA Businesses primarily source goods and services domestically, certain materials and equipment are sourced through international supply chains. In some instances, materials are provided directly by customers, which may limit visibility over upstream supply chains.

3.1 Risks of Modern Slavery Practices in Supply Chains

VEA owns Actemium, ODS, Omexom, Cegelec and Techtest. However, VEA is a non-operating entity. As such, the Modern Slavery risks largely sit with its subsidiaries, Actemium, ODS, Omexom, Cegelec and Techtest.

The companies’ respective supply chains are largely domestic, with only a small portion of materials being sourced from overseas locations and all work being done on domestic projects. As stated above, each company’s workforce is predominantly made up of longstanding, permanent employees and a number of properly onboarded subcontractors. Bearing this in mind, VEA considers that the level of Modern Slavery risk to each of the companies is low.

Actemium, ODS, Omexom, Cegelec and Techtest have collectively identified the predominant areas of modern slavery risk are as follows:

- Acquiring parts and equipment from overseas suppliers in geographical areas which are prone to Modern Slavery issues and where supply chains are not as transparent, monitored or controlled.
- Subcontractor & Supplier Management – ensuring that our subcontractor and suppliers' values align with those of our organisation in respect to code of conduct, human rights generally, ethical recruitment practices, equal opportunity & anti-discrimination, appropriate payment of workers, Safety, sustainability etc.
- Business Support Services – ensuring that our suppliers of support services such as cleaning, catering and the provision of PPE are complying with their obligations in respect to safety, fair and equal pay, working hours, training, payment of superannuation and other benefits etc.
- Recruitment – ensuring that all direct employees are lawfully employed with all appropriate documentation in place.

3.2 Actions taken to Assess & Address Risks (including due diligence & remediation processes)

Assess

On an annual basis, each of the VEA businesses undertake risk mapping activities regarding their respective supply chains. This activity achieves a dual purpose in that it acts as an audit for both Anti-Corruption & Anti-Bribery and Modern Slavery purposes.

In addition to supply chain risk mapping, the VEA businesses undertake annual Third Party Assessments (TPA) as part of the VINCI Energies Ethics & Compliance Program. Each Business Unit first identifies the third parties representing the highest risk exposure, generally its top 10 customers, its top 10 suppliers (including its five main subcontractors), and all agents and commercial intermediaries, documenting the selection so that those covering at least 80% of the Business Unit's activity are captured.

As part of each assessment, publicly available information is reviewed in respect of modern slavery and human rights matters, including whether the third party is required to lodge a Modern Slavery Statement and has done so, and whether there have been any reports, allegations or sanctions concerning modern slavery, human rights breaches, or non-compliance with wage payment or foreign worker engagement requirements. This review is supported by public reporting platforms and targeted media and reputation searches, with supporting evidence retained on file.

Where risks are identified, mitigation measures such as ongoing monitoring (for example, quarterly checks), compliance development plans, or termination of the relationship are applied.

VINCI Energies management also undertake Human Rights Audits at selected businesses, periodically.

During the 2025 reporting period, knowledge sharing around Modern Slavery risks continues across Actemium, ODS, Omexom and Techtest through regular consultation between the businesses and VEA management, allowing a combined approach to identify and combat those risks.

Address

The VEA businesses endeavour to identify Modern Slavery risks early via their Supplier and Subcontractor prequalification and onboarding processes.

As part of prequalification checks, the concept of Modern Slavery is explained, and Subcontractors and Suppliers are asked to confirm whether any of the matters identified are practiced within the business. At a

general level, Subcontractors are also required to have policies and procedures in place within their organisations which mirror those of the VEA Businesses, such as Equal Opportunity & Anti-Discrimination, Bribery & Anticorruption and a Code of Conduct. This information is confirmed by way of a declaration from a person authorised to bind the relevant subcontractor.

Actemium, ODS, Omexom and Techtest all have in place a Supplier Code of Conduct, which broadly identifies the corporate conduct standards each VEA business follows and expects of its customers, suppliers and subcontractors. More specifically, the Supplier Code of Conduct addresses corporate conduct matters such as Modern Slavery, anti-discrimination and equal opportunity, anti-corruption and anti-bribery, privacy, environmental and sustainability objectives etc.

A dedicated Modern Slavery training resource has been developed for deployment during the induction of new employees. This resource is designed to be facilitated in a face-to-face manner and will complement the existing Human Rights e-learning modules already deployed within the businesses via the VINCI Academy Platform.

In our view, insisting that Subcontractors and Suppliers share the same values as our organisation, helps protect us from Modern Slavery risks and unethical practice in business generally.

Relevant contractual documents for each VEA business (E.g. Purchase Order terms) include Modern Slavery expectations with further reference to and expected compliance with the Supplier Code of Conduct.

A low level of reliance is placed upon the fact that large organisations which may act as a supplier to the companies, may have Modern Slavery obligations of their own (reporting and otherwise). Understanding that they too are required to investigate, monitor and improve their own supply chains and that they may publicly report about these matters, allows VEA some comfort that its businesses and suppliers are working towards the common goal of reducing Modern Slavery.

3.3 Assess & Monitor Effectiveness & Consultation Between Businesses

VEA considers that the measures implemented to date (compliance with internal policies, supplier risk mapping, subcontractor and supplier prequalification, annual TPA, updating of contractual terms, implementation of the Supplier Code of Conduct, and development of a dedicated training resource) provide insight into where the Modern Slavery risks sit in the entities it controls and that VEA is taking proactive steps to manage those risks.

However, ongoing work will continue in relation to the following:

- supplier screening and onboarding processes, in particular, completing the roll-out of the digitised prequalification process across to the remaining businesses and continuing to review prequalification practices across the businesses;
- recruitment practices and general awareness of ensuring Modern Slavery training is undertaken;
- being alert to Modern Slavery risks in the business support space;
- continuing to identify risks and share learnings across the businesses;
- where possible, sourcing materials or equipment closer to home where Modern Slavery risks can be more closely monitored; and
- continuing development of a Corrective Action Plan.

3.4 Grievance Mechanisms and Whistleblower Protection

VEA and its subsidiaries maintain grievance and whistleblower mechanisms through which employees, contractors, suppliers and other stakeholders can raise concerns, including in relation to modern slavery.

Grievances may be raised informally or formally and are handled confidentially, fairly and without retaliation.

Reportable conduct, including human rights and modern slavery concerns, may also be raised under the Whistleblower Policy through a range of internal and external reporting channels, including the VINCI Integrity platform, which allows anonymous reporting.

Reports are investigated objectively and appropriate action is taken where issues are substantiated. Individuals who raise concerns in good faith are protected in accordance with applicable laws, including the *Corporations Act 2001* (Cth).

3.5 Stakeholder Engagement

VEA has engaged with a range of internal and external stakeholders to develop and implement its modern slavery policies and guidelines, including:

- the Boards and senior management of VEA and each of its subsidiaries (Actemium, ODS, Omexom, Cegelec and Techtest);
- Human resources teams across the businesses;
- procurement, supply chain and contract management personnel;
- health, safety, environment and quality (HSEQ) personnel;
- subcontractors and suppliers engaged by the VEA businesses;
- the VEA businesses' workforce, including field staff; and
- VINCI Energies and the ultimate parent company in France.

3.6 Consultation Between Businesses

VEA owns Actemium, ODS, Omexom, Cegelec and Techtest and as VEA is a non-operating entity, the Modern Slavery risks largely sit with the subsidiaries. Regardless, the overall objectives of VEA and each subsidiary are aligned in respect to the awareness and reduction of Modern Slavery and the impact each entity has on achieving that goal.

Actemium, ODS, Omexom, Cegelec and Techtest operate separately and independently, but have very similar policies, procedures and processes for all matters, including Modern Slavery. This is as a result of specific requirements set out by VEA and above that, VINCI Energies and VINCI. Ongoing consultation between the VEA entities occurs through regular engagement between the business and VEA management.

4. Conclusion

VEA is committed to operating ethically, responsibly and in compliance with applicable laws, including the Act.

VEA recognises that addressing modern slavery risks is an ongoing process requiring continuous assessment, engagement and improvement.

This Statement was approved by the Board of Directors of VINCI Energies Australia Pty Ltd on 29 June 2026 in accordance with section 13 of the Act.

Ghislain Olagne

Director

VINCI Energies Australia Pty Ltd

29 June 2026