



## Modern Slavery Statement 2021

VINCI ENERGIES Australia

# 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 meets the reporting requirements as set out in the Act as an entity with a consolidated revenue of at least \$100 million.

Consistent with VEA's financial reporting period running on a calendar year, this Statement addresses the reporting period of 1 January 2021 to 31 December 2021.

# 2. Our Business, Structure & Ethos

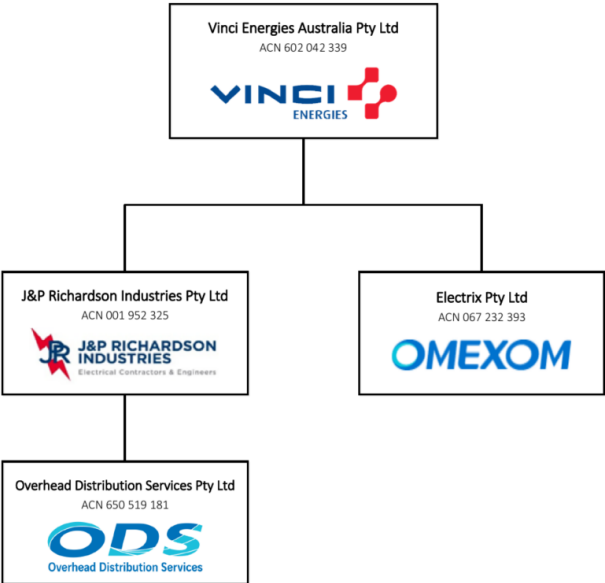
## 2.1 VINCI Energies – Parent Company

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, of which the reduction and management of Modern Slavery risks forms a part.

## 2.2 VINCI Energies Australia Pty Ltd

VEA is not in itself an operating company, but the parent of three subsidiaries in Australia, J&P Richardson Industries Pty Ltd ACN 001 952 325 (**JPR**), Electrix Pty Ltd ACN 067 232 393 trading as Omexom Australia (**Omexom**) and Overhead Distribution Services Pty Ltd ACN 650 519 181 (**ODS**).



## 2.3 Omexom

Omexom is 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.

## 2.4 JPR

JPR 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. JPR is primarily based in Queensland but offers services Australia wide.

## 2.5 ODS

ODS is a new subsidiary of JPR and as at the date of this statement, is a non-operating entity. Accordingly, this statement shall focus on the operating activities of JPR and Omexom only.

## 2.6 Broad Customer Base

JPR and Omexom 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

## 2.7 Workforce

JPR & Omexom have a combined workforce of approximately 630 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 JPR and Omexom is Australia based, with some travel required across State borders from time to time.

## 2.8 Ethos

JPR & Omexom approach their work grounded in the shared values of the global VINCI entities. These values and objectives are shared not only by all VINCI employees but are also used as a guide for our interactions with key stakeholders, subcontractors and suppliers.

At a global level, VINCI aims to engage in its various market areas, acting in the public interest whilst maintaining humanist values. It does this by ensuring its policies on matters of conduct, health and safety and human rights are enshrined in each of its business units and for those values to form the basis of all business decisions and interactions with employees, customers, suppliers and subcontractors.

In addition, at a global level VINCI has developed its Manifesto, setting out its overarching global commitments on how it will engage in the marketplace. The Manifesto offers commitments by VINCI regarding the way it will conduct itself in relation to matters such as compliance with ethical principles, accelerating the environmental transition, striving for zero accidents, fostering equality and diversity, amongst other objectives. Also important, is the Guide on Human Rights which sets out its policy position on the following matters:

- Labour Migration and Recruitment Practices;
- Working Conditions;
- Living Conditions;
- Human Rights Practices in the Value Chain; and
- Local Communities.

All of the above matters fall directly within the scope of Modern Slavery.

The Guide to Human Rights informs the policies and procedures of JPR & Omexom regarding each of the matters listed. To this end, both JPR & Omexom have robust policies in respect to:

- Recruitment – including background checks to ensure all employees are properly authorised to work in Australia and hold the appropriate qualifications to complete the required work. This in turn ensures that they receive the appropriate pay and allowances according to a relevant employment contract, award or enterprise bargaining instrument;
- Health & Safety – this includes policies and procedures regarding PPE that is required, steps to complete specific tasks, pre-start checklists, safe work method statements etc. These policies must also be followed by all subcontractors who work on a JPR or Omexom site;
- Equal Opportunity & Anti-Discrimination;
- Modern Slavery;
- Subcontractor Prequalification; and
- Code of Conduct.

VEA considers that the overarching guiding framework established by the Manifesto and all company policies and compliance procedures (including the policies referred to above) and the fact that all managers within all VINCI entities are required to record their commitment to following the Manifesto, policies and compliance procedures, assists both JPR and Omexom to manage their Modern Slavery risks.

### 3. Our Supply Chains

The procurement of general supplies, parts and equipment of varying kinds is critical to the nature of the work performed by JPR & Omexom. The items procured fall into the following broad categories:

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

Occasionally, parts and equipment will be free issued by a customer, thereby limiting the ability to identify the source of the item and its attached supply chain.

### 3.1 Risks of Modern Slavery Practices in Supply Chains

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

JPR & Omexom’s 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, JPR & Omexom’s workforce is predominantly made up of longstanding, permanent employees and a small 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.

Similar to 2020, the entities 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. This risk has been taken a step further in the 2021 period, with supply chains tightening. Sourcing materials became more difficult during this period, particularly when materials, parts or items of equipment were required within tight timeframes. The associated modern slavery risk is around having to source materials from unknown or unfamiliar suppliers; and
- Subcontractor Management – ensuring that our subcontractors’ 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 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, training, payment of superannuation and other benefits etc.

## 3.2 Actions taken to Assess Risks & 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 Anticorruption & Bribery and Modern Slavery purposes.

This process involves:

- Identifying the most predominant suppliers and subcontractors in each business unit;
- Identifying where the use of those suppliers and subcontractors expose the business unit to risk;
- Ensuring that all subcontractors and supplier entities are appropriately registered to conduct business; and
- Where risks arise, follow a set process to mitigate the risk.

This process was undertaken again in the 2021 period.

Importantly, at the commencement of this reporting period, the Modern Slavery Working Group was established comprising members across JPR and OMX. This cross section of members has encouraged knowledge sharing around Modern Slavery risks across both businesses and also allowed a combined approach to identify and combat them.

### Address

In addition to the annual risk mapping, the VEA businesses endeavour to identify Modern Slavery risks early via their Subcontract prequalification and onboarding processes.

As part of prequalification checks, the concept of Modern Slavery is explained and Subcontractors 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.

In addition, during the 2021 period, a Supplier Code of Conduct was developed 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.

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

Also during the 2021 period, the businesses have conducted an audit of relevant contractual documents to ensure that Modern Slavery expectations are more specifically addressed and reference to the Supplier Code of Conduct included in those contractual terms. Some changes to those terms have been made and others are still progressing with a view to having them implemented in the near future.

Finally, a low level of reliance is placed upon the fact that large organisations which may act as a supplier to either business, 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 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 (supplier risk mapping, subcontractor prequalification, establishment of the Modern Slavery working group, updating of contractual terms and implementation of the Supplier Code of Conduct) go some way to providing 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:

- Improving supplier screening and onboarding processes;
- Being alert to Modern Slavery risks in the business support space;
- Continuing to identify risks and shared learnings across the businesses via the Modern Slavery Working Group; and
- Where possible, sourcing materials closer to home where Modern Slavery risks can be more closely monitored.

### 3.4 Consultation Between Businesses

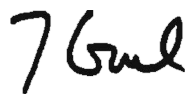
VEA owns and controls JPR and Omexom and as VEA is a non-operating entity, the Modern Slavery risks largely sit with the subsidiaries. Regardless, the overall objectives of VEA and each subsidiary are aligned in respect to the awareness and reduction of Modern Slavery and the impact each entity has on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

JPR and Omexom operate separately 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. As mentioned above, the Modern Slavery Working Group allows ongoing and productive consultation between the VEA entities.

## 4. Conclusion

VEA is committed to ensuring that it operates its business fairly, ethically, in accordance with its legal requirements and in an environment where continuous improvement is encouraged.

This Modern Slavery Statement is approved by the VEA Board of Directors.



Jerome Guiral  
Managing Director  
VINCI Energies Australia Pty Ltd  
30 June 2022