



# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Powell Engineering UK Limited (trading as Omexom)  
Financial Year 2024

MEXOM



**Introduction from the Board of Directors of Powell Engineering UK Limited, trading as Omexom**

This Modern Slavery and Human Trafficking 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 business and supply chain.

It continues to be a priority for Powell Engineering UK Limited, hereinafter Omexom, to ensure that we trade ethically and source responsibly. Omexom adheres to and promotes key policies and guidance to ensure that anyone who works on its behalf is aware of the way in which Omexom does business which is to act responsibly and ethically.

The Omexom board is committed to ensuring that Omexom 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**

Omexom is a brand of VINCI Energies dedicated to energy transition positioned across the entire value chain, from generation to transmission and distribution grids and the final customer's meter. Globally the Omexom brand has over 426 business units in 36 countries on 5 continents.

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. The VE Group has over 2,100 business units, 102,600 employees worldwide and revenue of EUR €20,4 billion.

**Our Business**

Our business is organised into 15 business units who provide an entire range of engineering, construction and maintenance services to its customers. As an integrator in the energy sector, Omexom supports its customers with complex project management and turnkey solutions. Omexom's expertise in the field of electrical grids allows us to anticipate the impact of renewable energies. In addition, we develop storage solutions, making more sustainable infrastructures and meet new consumption trends.

In 2024, some of the projects with which Omexom engaged included substations, wind farms and other renewable energy projects.

**Our People**

People are at the heart of Omexom. 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 pre-employment Right to Work checks to ensure that anyone working on our behalf and any discrepancies are thoroughly investigated. This enables us to ensure that employees have the right documentation in their possession and a bona fide bank account in their own name.

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 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 all our suppliers are required to complete our Supplier Pre-Qualification Questionnaire (PQQ) which is hosted by Builders Profile, an open-access Common Database providing compliance and PQQ information to the construction industry. 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 flow down to the supplier's supply chain.

During the PQQ process, every supplier is requested to sign up to the following:

- Code of Ethics and Conduct;
- Guidelines on Human Rights;
- VINCI Manifesto;
- Anti-corruption Code of Conduct; and
- Omexom Supply Chain Code of Conduct.

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

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

- Legal
- Human resources
- Procurement





**Our Policies on Slavery and Human Trafficking**

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.

- 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 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 as well as a fully equipped training facility at the Omexom Institute. 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 all of 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 indices of modern slavery in 2024 within our own business or our supply chain, and therefore no investigations or remedial activities were required

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### 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:

- Training of employees;
- Reviewing supplier onboarding processes; 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 Powell Engineering UK Limited, trading as Omexom, on 18th March 2025.



Simon Innis  
Director - Omexom

