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# NUVIA LIMITED

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Company Approach

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NUVIA UK is an international nuclear engineering, project management and service provider. NUVIA UK is a world-class provider of nuclear services with over 50 years' experience. NUVIA UK is a trusted partner committed to supporting clients to deliver their nuclear operations safely and efficiently.

A subsidiary of Soletanche Freyssinet and part of the VINCI Group, NUVIA UK is an international company that operates world-wide on highly regulated and sensitive industrial sites. NUVIA UK operates at the forefront of the nuclear industry with a reputation for safe, high-quality delivery and solutions to some of the most complex and technically challenging engineering projects.

Since 2003, VINCI has supported and been a member of the United Nations Global Compact and adheres to the [Ten Principles](#) covering Human Rights; Labour; Environment and Anti-Corruption. We work collaboratively with our Supply Chain and adhere to our core values. All Group companies share a mutual Code of Ethics and Conduct. Principles of the [Code of Ethics and Conduct](#) are reflected within our vision of development our modern slavery statement.

NUVIA UK takes its responsibility to avoid and mitigate any modern slavery in its operations extremely seriously. To that end, our policy is one of regular review and development. Our approach to modern slavery is governed by our Operations Board, who provide leadership from the top down, continually striving for best practice and leading by example. Risks around modern slavery are considered through our Risk Committee which meets on a quarterly basis and reviewed by the Board on the same frequency. Our modern slavery policy is communicated to our Supply Chain, embedded into our Procurement policy and forms part of the way we work.

#### **Our People**

At NUVIA UK we are committed to operating ethically, we act with integrity with our stakeholders and the community to try and eliminate modern slavery presenting itself in our business. We have a people focused culture with the highest HSE standards, we work with local communities so we can grow stronger together. We ensure through all of our operations, whether through employees working in the UK or located overseas respect, valuing of diversity and adherence to the applicable laws.

We collectively work in line with the VINCI Manifesto, we share a mutual Code of Ethics and Conduct, the Code is delivered by the Director and Chief Executive Officer of the VINCI Group.

There are a number of Group documents, including:

- The VINCI Manifesto
- Code of Ethics and Conduct
- Corporate Social Responsibility

- Modern Slavery and Human Trafficking
- Anti-Bribery
- Fairness, Inclusion and Respect.

Further details can be found at [www.vinci.com](http://www.vinci.com)

NUVIA UK continually take steps to prevent modern slavery, promote awareness in this area and action in line with the Modern Slavery Act 2015. This is demonstrated in the below company policies:

- HRI4006 Business Code of Conduct
- HRI6006 Public Interest (PID) Whistleblowing Instruction
- HRI6005 Equality, Diversity & Inclusivity
- P003 Environmental & Energy Policy

These policies apply to all individuals working for NUVIA UK or on the Company's behalf in any capacity, including employees, directors, agency workers, contractors, and consultants.

We have robust procedures in place for confirming the identity of all employees through Right to Work and Pre-employment checks on all employees joining the organisation, contractors and agency staff, and that any monies are paid directly into an appropriate bank account and not a third party. Standard UK Security Vetting (UKSV) procedures are followed, this includes asking employees to provide recognised identification documents, reference checks are also undertaken for employees, workers and agency staff. Any discrepancies identified are thoroughly investigated, addressed before employment and appropriate action taken. Nuvia will not confiscate workers original identification documents.

NUVIA UK operate a comprehensive system, working with a consistent number of approved recruitment agency partners, to fulfil our contingent workforce requirements under a preferred supplier list. We annually review and update our contracts with the recruitment agency partners. Each partner and every single temporary worker that has been engaged within our business is audited to ensure compliance with our internal process, expectations and the contract requirements. Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made.

We have an e-learning module available and deployed company-wide to raise awareness in modern slavery and human trafficking issues and ensure compliance with this policy statement. The Board, Procurement, Project Delivery team members and Human Resources are all mandated to complete the e-learning module, so that they know how to identify exploitation and modern slavery and how to report suspected cases. This is a KPI reported to and monitored by the Board through the HR Director on an annual basis.

## Supply Chain

NUVIA UK recognises its responsibilities in preventing Modern Slavery and/or Human Trafficking taking place in any tier of its supply chain. Accordingly, we have robust processes in place to ensure, as far as reasonably practical, that our supply chain adhere to our expectations in respect of their workforce, their suppliers, and sub-suppliers.

All potential suppliers are first provided with a link to the VINCI [Code of Ethics and Conduct](#), and are required to confirm that they have understood and agree to abide by its goals, principles and aspirations. In addition, other than providers of Commercially Off The Shelf (COTS) products, all potential suppliers are required to complete a comprehensive supplier prequalification questionnaire, which includes sections on Modern Slavery, the eligibility of employees to work in the UK, and Equal Opportunities.

The information received is thoroughly reviewed, and any areas of concern are addressed with potential suppliers before they can be considered for approved supplier status with NUVIA UK. Without approved supplier status, no third party is able to receive an order to supply goods or carry out work for NUVIA UK.

NUVIA UK carry out audits on our supply chain, both as part of the supplier assessment process (if deemed necessary) and under our ongoing Quality Assurance Audit programme. These audits include physical audits of our suppliers' records pertaining to workers on our projects and their own supply chains.

It is worth noting that almost the entire NUVIA UK supply chain is based in the UK. However, in instances of potential suppliers from outside the UK and the European Union, additional due diligence is carried out as mandated by VINCI,

which includes risk mapping in accordance with the country ratings contained in the World Governance Indicator Table, which is supported by the World Bank.

As part of their membership of the Chartered Institute of Procurement & Supply (CIPS), Procurement personnel also undertake annual ethics training, which includes in-depth modules on Human Trafficking and Modern Slavery, to ensure that their knowledge is kept up to date. In addition, membership of CIPS automatically requires Procurement personnel to abide by the [CIPS Code of Conduct](#), which has the eradication of unethical business practices as one of its core values.

As per our commitment made in our 2022 Modern Slavery Statement, during the previous 12 months we have voluntarily undertaken the completion of the Modern Slavery Assessment Tool (MSAT) to further strengthen our commitment and support.

In addition, during 2022 NUVIA UK achieved the CIPS Corporate Ethics Kitemark, in recognition of our standards and commitment in respect of ethical sourcing.

This statement has been reviewed and approved by the Board in September 2023 and will be reviewed and updated appropriately in 2024.



Tom Jones  
Chief Executive Officer