

## Modern Slavery and Human Trafficking Statement

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| Checked By                             | Approved By      |
|--|------------------|
| R Fearnside, Culture & People Director | Tom Jones, CEO   |
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| Revision | Comments  |
|----------|---|
| A -B     | No revision history recorded  |
| C        | Reformatted, number changed from P018 to P030 to reflect the amendment from a policy format     |
| D        | Inclusion of Risk Committee reference<br>Expansion around worker documentation Reference to KPI |
| E        | Expansion of Introduction, Supply Chain & review dates  |
| F        | Annual review   |

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# 1 Company Approach

NUVIA Limited is an international nuclear engineering and project management company with over 50 years of experience, providing high-quality nuclear services and is a trusted partner committed to supporting clients to deliver their nuclear operations safely and efficiently.

NUVIA Limited is a subsidiary of Soletanche Freyssinet and is part of the VINCI Group. The business operates internationally on highly regulated and sensitive industrial sites. The company is a recognised leader for safe, high-quality delivery across some of the nuclear industry's most complex engineering projects. NUVIA Limited collaborates regularly with sister companies to share best practice and lessons learned, meeting across key disciplines such as Procurement, Human Resources, Safety, Health & Environment.

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 of Excellence; Entrepreneurship; Team Spirit; Humility and Transparency. All group companies share a mutual Code of Ethics and Conduct, which all colleagues are required to understand and agree to abide by. The code is delivered by the Chief Executive of VINCI. Principles of the Code of Ethics and Conduct are reflected in our vision and development of our Modern Slavery and Human Trafficking Statement.

NUVIA Limited 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 Board of Directors, who provide leadership from the top down, continually striving for best practice and leading by example. The VINCI Code of Ethics is communicated to all suppliers, embedded in our procurement processes, and underpins the way we work across the company.

# 2 Our People

At NUVIA Limited 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. Social enterprise is fundamental to our business; we work in and with local communities so we can grow stronger together. Across all our operations, in the UK and overseas, we uphold the highest standards of respect, valuing diversity, and complying with all applicable laws.

There are a number of Group documents, including:

- The VINCI Manifesto
- Code of Ethics and Conduct
- Guide on Human Rights
- Corporate Responsibility
- Anti-Corruption Code of Conduct

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

NUVIA Limited continually takes 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 company policies below:

- HRI4006 Business Code of Conduct
- HRI6006 Public Interest (PID) Whistleblowing Instruction
- HRI6005 Equality, Diversity & Inclusivity
- HRI6012 Anti-harassment and anti-bullying
- CP0201 Recruitment
- P003 Environmental & Energy Policy
- P017 Sustainable Procurement Policy

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

We carry out Right to Work and Pre-Employment checks on all colleagues joining NUVIA Limited. This includes, before employment, the colleague being able to provide evidence that they are in possession of their own identification documents and that the bank account details provided belong to them and not a third party. Any discrepancies identified are investigated thoroughly and appropriate action taken. 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.

NUVIA Limited 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. 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.

A company-wide e-learning module raises awareness of modern slavery and human trafficking and supports ensuring compliance with this 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.

### 3 Supply Chain

NUVIA Limited 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. NUVIA Limited work closely with the VINCI Supply Chain Modern Slavery Working Group to foster collaboration between group companies to eliminate modern slavery.

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 and confirm that they comply fully with the Modern Slavery Act 2015. In addition, any potential supplier identified as

higher risk is 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. Responses to the pre-qualification questionnaire help us identify suppliers who may need to improve their approach to modern slavery, allowing us to act where necessary.

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.

NUVIA Limited 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 Limited 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.

In addition, NUVIA Limited continues to hold 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 February 2026 and is made in accordance with Section 54(1) of the UK Modern Slavery Act 2015 and constitutes NUVIA Limited Modern Slavery Statement for the financial year 31st December 2026. Our next statement will be published in February 2027.

Signed

A handwritten signature in blue ink, consisting of a series of fluid, connected loops and curves, followed by a period.

Tom Jones, CEO

March 2026