

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Virtua UK Limited acknowledges its responsibilities under the Modern Slavery Act 2015. Virtua UK is committed to driving out acts of modern day slavery and human trafficking within its business and from within its supply chains, including sub-contractors.

Modern slavery is a crime and a violation of fundamental human rights.

Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity. This includes employees at all levels, directors, agency workers, volunteers, contractors and suppliers.

Virtua UK strictly prohibits the use of modern slavery and human trafficking. We continue to be committed to the implementation of systems and controls aimed at ensuring that modern day slavery or human trafficking is not taking place anywhere within our organisation, or in any part of our supply chain. We expect that our suppliers will hold their suppliers to the same high standards.

Commitments

Virtua UK expects all those working with us to support and uphold the following measures in order to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chains.
- We will use a risk-based approach to our contracting processes, incorporating regular reviews. We assess whether circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Using a risk-based approach we may require employment and recruitment agencies and other third parties supplying workers to Virtua UK Limited, to confirm their compliance with our code of conduct. Suppliers engaging workers through a third party may be required to obtain that third parties' agreement to adhere to the code.
- As part of our ongoing risk assessment and due diligence process, we will consider whether circumstances warrant us carrying out audits of suppliers to ensure they are complying with our code of conduct.
- As part of this organisation's due diligence process into slavery and human trafficking the supplier approval process will incorporate a review of controls undertaken by the supplier. Imported goods from outside the UK are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continuously monitored.

Any individuals or organisations who work for us or on our behalf, who are found to have breached this policy, will be subject to appropriate action. Disciplinary action may be taken against individual(s) and/or termination of our relationships with any organisation or supplier

Approved by:



Andy Richards

Chief Executive Officer

November 2022