



# MODERN SLAVERY POLICY

vital energi information for a sustainable future



## MODERN SLAVERY POLICY

**Policy statement:** Modern slavery is the illegal exploitation of people for personal or commercial gain, and involves people being coerced and forced into providing a service to others. It is a serious and organised crime that destroys lives. People of all genders, ages (including children) and ethnicities can be victims of modern slavery and it is a violation of fundamental human rights. Vital Holdings Ltd and its subsidiaries (the Company) adopts a zero-tolerance approach to modern slavery and human trafficking, and all forms of corruption and bribery, directly and indirectly, associated with these criminal acts.

### POLICY PURPOSE

The Company believes that everyone has a right to be treated with dignity and respect at all times, and in all circumstances. We recognise that as a business with a large and complex supply chain, there is a risk people are being exploited to provide the goods and services we procure, and that risk increases when our supply chain extends beyond the UK.

Whilst we do not tolerate abuse within our direct business activities, we must take steps to ensure that we identify and tackle any instances of modern slavery in our supply chain. The purpose of this policy is to provide a framework to ensure:

- ▶ All Company employees, subcontractors and consultants understand and are aware of their responsibilities in relation to modern slavery
- ▶ The development of a strategic approach to identifying and tackling any modern slavery within our supply chain;
- ▶ The implementation of robust, transparent and proportionate governance and assurance processes
- ▶ Reporting of the steps we've taken to ensure there is no modern slavery in our business or supply chain and any instances (or concerns) of modern slavery, in accordance with the Modern Slavery Act 2015 and its accompanying guidance, "Transparency in Supply Chains etc: a practical guide" by publishing an annual Modern Slavery Statement.

### ROLES AND RESPONSIBILITIES

This policy describes the Company's commitment to promoting ethical business practices and policies that protect workers from being abused or exploited. The prevention, detection and reporting of modern slavery in any part of our business and supply chain is the responsibility of all those working for us or on our behalf.

However, certain individuals within the business do have specific responsibilities in relation to preventing modern slavery and human trafficking. They are:



**1 Head of HR/HR Department** – employment policies, vetting of candidates and employment agencies, staff awareness and training



**3 Commercial Directors** - supply chain policies, vetting, communication of policies and any updates as well as also monitoring compliance



**2 Head of ESG** - sustainability policies, setting and monitoring key performance indicators, reporting



**4 SHEQ Director** - oversight of risk assessments and internal assurance, appointing external auditors

This is one of a suite of policies intended to communicate our values and standards to all stakeholders, fostering confidence that Vital is a responsible company to work for, buy from, invest in and partner with. This policy is owned by the Managing Directors with ultimate oversight resting with the Vital Group Board, including the approval of any changes to the policy.





## MODERN SLAVERY POLICY

### PRINCIPLES OF CONDUCT

The Company requires all organisations with whom it is engaged to operate to the highest level of ethical standards and to hold their own suppliers to the same high standards. Suppliers are expected to ensure that their goods, services, materials and labour-related supply chains fully comply with the Modern Slavery Act 2015.

In accordance with our Sustainable Procurement Policy, the Company requires our supply chain partners to be vetted through the Alcumus SafeSupplier or SafeContractor databases, or provide sufficient information directly to us to enable us to verify that the supplier meets our values and standards.

The Company will carry out detailed supply chain mapping to ensure that we understand our supply network as comprehensively as possible. We want to know who our suppliers are, what they provide, and how they provide it.

Suppliers who supply goods or services deemed to be at particular risk of modern slavery will be subject to enhanced due diligence by the Company. For example, solar PV has been identified as a high risk due to potential for forced labour in the extended supply chain. Such suppliers can expect to be asked detailed questions designed to help us assess the capacity of the supplier to manage and prevent the risks of modern slavery and to identify opportunities to work in partnership to improve protections and reduce the risk of exploitation of workers in their supply chains. We also reserve the right to conduct audits, either during onboarding of new suppliers or on an ad hoc basis for existing suppliers.

The Company acknowledges that contractors may be at different stages of their journey towards having more ethical supply chains; however we expect to see recognition of the issue and demonstration of continuous improvement in how modern slavery risks are mitigated.

### AWARENESS AND TRAINING

The Company will raise awareness of this policy, and of the dangers of modern slavery itself, by publishing the policy on our website and company intranet, and notifying all staff and our supply chain that it should be read.

We will look for opportunities to raise awareness of modern slavery and human rights abuses during the course of our normal business activities. Appropriate training and guidance will be provided, particularly for commercial and procurement staff, human resources staff and any staff involved in due diligence or auditing.

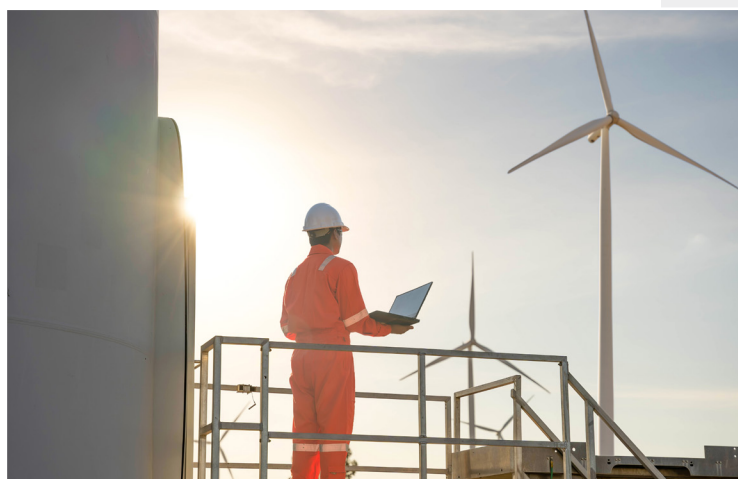
General staff training will be made available, including how to spot the signs of modern slavery and the procedures to follow to ensure that suspected instances are handled correctly. In certain circumstances, training may be extended to our suppliers; however, suppliers will retain their overall responsibility of providing adequate training to their staff. We will maintain records of all members of staff and suppliers who have completed modern slavery training.

### ASSURANCE AND TRANSPARENCY

Vital Energi has committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere either within our direct operations or in our supply chain.

We take a risk-based approach to procurement, contract management, and supply chain management processes in relation to modern slavery. These processes are kept under continuous review. As part of ongoing risk assessment and due diligence, we will consider whether circumstances warrant the auditing of suppliers to demonstrate their compliance with this policy.

This policy will be accompanied by our annual Modern Slavery Statement, published each financial year, which will include details of activities undertaken by the Company to combat modern slavery in its business and supply chains. The Modern Slavery Statement will be published on our website within 6 months after the last financial year end.





## MODERN SLAVERY POLICY

### NON-COMPLIANCE, REMEDIATION, REPORTING AND VICTIM SUPPORT

If any Company employee is found to have breached this policy, then appropriate action will be taken in line with our disciplinary procedures.

If any supplier is found to have breached this policy, then appropriate action will be taken and reviewed on a case by case basis; this may range from considering the possibility of breaches being remediated, to terminating agreements.

Remediation will focus on the victims of the breach. Remedial actions will be aimed at identifying and stopping the occurrence of modern slavery, as well as preventing future occurrences. We will seek to partner with organisations such as NGOs who have the knowledge and local presence to support the affected communities, and/or collaborate in industry-led schemes designed to improve supply chain labour standards. We will also conduct internal reviews and apply lessons learned, including enhanced training for our own staff where required.

Individuals who have reasonable suspicion or evidence of non-compliance with the Modern Slavery Act are encouraged to report their concerns, either in accordance with the Company's Whistleblowing Policy or directly to their line manager, the Head of HR, Head of ESG, or SHEQ Director.

**Gary Fielding**

Chairman

Date: December 2023

### REPORTING

Our policy emphasises the significance of transparent and comprehensive reporting as a means to assess, communicate, and continuously improve our efforts. Our reporting framework includes robust mechanisms for risk assessment, due diligence, and the implementation of effective mitigation strategies. By regularly disclosing our initiatives, we not only enhance internal accountability but also engage stakeholders, including employees, customers, and investors, in our collective pursuit of ethical business practices.

Any information that could lead to the identification, discovery and recovery of victims of modern slavery or human trafficking in the UK **should be reported** through one of the below options:



Via the Modern Slavery Helpline on **0800 121 700** (open 24 hours a day, 365 days per year)



or online at **[www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org)**

### CONTINUAL IMPROVEMENT

The Company is wholly committed to ensuring the continual improvement of our ethical business practices. We therefore commit to setting and reviewing targets in relation to modern slavery and reporting on them annually.

As part of our commitment, we will communicate this policy to all employees and organisations working on our behalf and ensure the latest version is available on our website for interested parties to view it openly as appropriate. This policy will be reviewed at least annually.

### BOARD APPROVAL

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Vital's slavery and human trafficking policy for the financial year ending 30 June 2023.

This statement has been approved by the Chairman, Chief Executive Officer and SHEQ Director.

**Ian Whitelock**

CEO

Date: December 2023

**Sean Black**

Director of SHEQ

Date: December 2023