

# Modern Slavery & Human Trafficking Policy Statement

VITRUVIUS

Vitruvius Management Services Ltd is a project and construction management consultancy which leads, manages and delivers commercial construction projects. We are committed to corporate and social responsibility and believe transparency is the best way we can ensure the public that we are doing our best as an ethical, corporate citizen.

Our “Modern Slavery and Human Trafficking Policy” made pursuant to section 54 (1) of the ‘**Modern Slavery Act 2015**’, reflects our commitment to acting ethically and with integrity in all our business relationships and to ensure that slavery and human trafficking are not taking place.

Building on our existing ‘Corporate and Social Responsibility Policy’ and our commitment to Ethical Trading we have embraced the requirement to publish an annual Modern Slavery and Human Trafficking Statement on our company website which is easily accessible by all our partners, staff and contractors.

## 1.0 **Responsibility**

The management of the firm has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all of our people comply with it.

## 2.0 **Our Policies**

Vitruvius are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015. Our policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners. We also operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

### 2.1 **Equal Opportunities Policy**

We are fully committed to ensuring that equal opportunities policies are implemented and maintained. All terms and conditions of service apply on a fair and consistent basis to every member of staff.

### 2.2 **Recruitment Policy**

We operate a robust recruitment policy, including conducting checks on work eligibility for all employees to safeguard against human trafficking or individuals being forced to work against their will.

### 2.3 **Corporate & Social Responsibility Policy**

We continue to advocate corporate responsibility in every facet of our business on a daily basis.

## 3.0 **Compliance**

Vitruvius encourages openness and will support anyone who raises genuine concerns in good faith, and are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their knowledge, or suspicion, that modern slavery is taking place in any part of our business or in any of our supply chains. The prevention, detection and reporting of modern slavery and/or human trafficking in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees or associated persons are required to avoid any activity that might lead to, or suggest, a breach of this policy.



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## 4.0 Key Performance Indicators

We use the following key performance indicators (KPIs) to determine how effective our performance measures are to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- **Relationships** - Strengthening our supplier engagement process.
- **Feedback** - Establishing grievance mechanisms and channels for individual worker feedback.
- **Knowledge** - Improving our knowledge base by collecting relevant data and improving product traceability.
- **Measurable Change** - Developing our KPIs to measure progress
- **Supplier Collaboration** - Encouraging suppliers to collaborate to address slavery and human trafficking issues.
- **Incentivisation** - Developing mechanisms to incentivise employees and suppliers to address slavery and human trafficking and improve labour standards.
- **Accountability** - Establishing a framework for organisation accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery and human trafficking.

## 5.0 Communication and Awareness

Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. As part of our contract with suppliers, we require that they confirm that:

- They have taken steps to eradicate modern slavery within their business;
- They pay their employees at least the national minimum wage / national living wage as currently legislated.

## 6.0 Action

The Company will fully investigate any instances of any employee, subcontractor etc. who breach this policy and will invoke its Disciplinary Procedures. The employee may be suspended from their duties while the investigation is being carried out and proven allegations may result in a finding of gross misconduct and immediate dismissal. The Company may also terminate the contracts of any associated persons, including consultants or other employees who act for, or on behalf of, the Company who are found to have breached this policy.

**This policy has been established, agreed and endorsed by the Directors of Vitruvius Management Services Limited.**

Vitruvius Management Services Ltd

Dated: 9<sup>th</sup> January 2024

Issue No. 7

