

Modern Slavery & Human Trafficking Policy Statement

Vitruvius Management Services Ltd are committed to preventing modern slavery and human trafficking in all areas of our business and our supply chains. We recognise our responsibility under the **Modern Slavery Act 2015** to ensure that slavery, servitude, forced or compulsory labour, and human trafficking have place to operate within our supply chain.

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.

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 Policy

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. Vitruvius Management Services have a ‘zero-tolerance approach’ to modern slavery and are committed to ensuring there is transparency in our own business and in our approach to the tackling of this issue throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015.

- Acting ethically and with integrity in all business relationships.
- Implementing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.
- Communicating with our supply chain partners and subcontractor on the requirements of the Modern Slavery Act

We also operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

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.

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.

Corporate & Social Responsibility Policy - We continue to advocate corporate responsibility in every facet of our business on a daily basis.

4.0 Training, Awareness & KPI's

We are committed to ensuring that all employees involved in procurement, contract management, and site supervision are equipped to recognise and respond appropriately to potential risks of modern slavery.



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Training and guidance are provided to both employees and subcontractors to raise awareness of their responsibilities under the Act and to promote best practice across our operations and supply chains i.e.

- Recognising the signs of slavery and human trafficking and the steps to take if slavery or human trafficking is suspected.
- Escalation procedures for raising concerns both internally and externally.
- Addressing non-compliance, including measures such as removal from our supply chain where suppliers or contractors fail to implement adequate anti-slavery policies in high-risk situations.

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 and they pay their employees at least the national minimum wage / national living wage as currently legislated.

5.0 Reporting Concerns

The Company encourage staff, subcontractors, and supply chain partners to report any concerns related to modern slavery through our 'Whistleblowing Procedures'. Reports will be treated confidentially and investigated thoroughly.

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 is in line with our documented and implemented 'Integrated Management System' and has been established, agreed and endorsed by the Directors of Vitruvius Management Services Limited.



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