

# Vitruvius Management Services Ltd

## Modern Slavery & Human Trafficking Policy 2020

VITRUVIUS

### Commitment

Vitruvius Management Services Ltd (“Vitruvius”/“the Company”) are committed to corporate, and social responsibility and transparency. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

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 and update as and when required, a Modern Slavery and Human Trafficking Statement on our company website which is easily accessible by all our partners, staff and contractors.

### 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:

- **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.

### 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.

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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.

If there is any doubt about whether a particular act or working condition(s) in any of our business relationships may contravene any aspect of this policy then employees or associated persons are encouraged to discuss a specific matter (or our policy or relevant legislation) with our Managing Director or report any suspected misconduct and/or illegal acts in line with our 'Whistleblowing Policy'.

### Our Business

We conduct all of our business in an honest and ethical manner with our employees at the heart of our business. We focus on our staff and we commit to working with them to develop their skills by giving them opportunities, freedom and support. We operate a robust recruitment policy to safeguard against human trafficking or individuals being forced to work against their will and comply with all applicable legislation relating to employee terms and conditions, including pay.

We are committed to ensuring there is no modern slavery or human trafficking taking place within our supply chains and that we act ethically and with integrity in all business dealings and relationships. We also expect this level of high standards from our contractors, suppliers and business partners. We only use reputable recruitment agencies that ensure all employee checks are undertaken to confirm eligibility to work

### Working with our Suppliers

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.

### Key Performance Indicators

- **Relationships**  
Strengthening our supplier engagement process.
- **Feedback**  
Establishing grievance mechanisms and channels for individual worker feedback.
- **Measurable change**  
Developing our KPIs to measure progress
- **Supplier collaboration**  
Encouraging suppliers to collaborate to address slavery and human trafficking issues.

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- **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

### Action by the Company

The Company will fully investigate any instances of any employee or associated persons who breach this policy and may be suspended from their duties while the investigation is being carried out. We will invoke our Disciplinary Procedures and proven allegations may result in a finding of gross misconduct and immediate dismissal.

This Statement and our Modern Slavery & Human Trafficking Policy will be subject to regular and ongoing reviews (at least annually) to ensure its effectiveness, and will be updated/amended when further measures are identified,

*This statement is pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Vitruvius Management Services Ltd. current Modern Slavery & Human Trafficking Policy, which will be reviewed and updated on an ongoing basis. It was approved by the Board of Directors on 28<sup>th</sup> January 2020.*

**Dated:** 28<sup>th</sup> January 2020

**Issue No.** 1