

# Modern Slavery Policy

Approved by the Board January 2025

# **Modern Slavery Policy**

Vp plc is committed to maintaining the highest ethical standards and operating in a way that ensures the protection of human rights and dignity. We have zero tolerance for modern slavery and human trafficking in all forms and are committed to ensuring that we are mitigating the risks of modern slavery or human trafficking as far as reasonably possible in any part of our business operations or supply chain. We will act responsibly and transparently to identify, prevent, and address any risks related to modern slavery and human trafficking.

This policy outlines our commitment to combating modern slavery, in accordance with the Modern Slavery Act 2015 and other applicable laws, and sets out our expectations for the conduct of our employees, suppliers, and business partners.

### Scope

This policy applies to all employees, contractors, and suppliers of Vp plc, across all areas of operation within the UK and internationally, where applicable. It extends to the relationships we maintain with our supply chain partners, contractors, and subcontractors.

#### **Our Commitment:**

- Compliance with the Modern Slavery Act 2015: Vp plc will ensure full compliance with the Modern Slavery Act 2015 and other relevant legislation. This includes publishing a statement each year, which will outline the steps we have taken to ensure we are mitigating the risks of modern slavery within in our business or supply chain. We will for effectiveness continue to review these documents to also include other aspects such as the Fair Work Act.
- Risk Assessment: We will regularly assess the risks of modern slavery and human trafficking within our operations and supply chain, particularly where we have the most significant risk exposure. We will be improving our assurance framework to ensure process adherence in all high-risk areas of the business.
- Due Diligence and Supplier Code of Conduct: We will be refreshing our supplier on-boarding process to ensure suppliers are aware of and striving towards our standards in relation to modern slavery. We will also be reviewing our existing supplier base to ensure that our partners are continuing to uphold these standards.
- Training and Awareness: We will continue to provide training opportunities to our employees, with a focus on those involved in procurement, human resources, and supply chain management, on how to identify, prevent, and respond to modern slavery. We will also continue to ensure that employees are aware of how to report concerns related to modern slavery.
- Reporting and Whistleblowing: We will continue to encourage employees, suppliers, and stakeholders to report any concerns regarding modern slavery or human trafficking via our whistleblowing policy. We will continue our commitment in having a clear and accessible whistleblowing procedure in place for this purpose. All reports will continue to be treated confidentially, and no individual will face retaliation for raising legitimate concerns.

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- Actions in the Event of a Breach: If a breach of this policy is identified, we will take appropriate and swift action to investigate and address the situation. This could include terminating contracts with suppliers, taking legal action, or collaborating with relevant authorities to tackle any instances of modern slavery or human trafficking.
- Monitoring and Auditing: Vp plc will regularly monitor and audit its operations and supply chain to ensure compliance with this policy. This includes carrying out inspections, reviewing reports, and requesting evidence from suppliers to verify adherence to the principles of modern slavery prevention.
- Internal Collaboration: Vp plc will be adopting a stronger collaborative approach to mitigate the risks of modern slavery across the group by working together across departments such as Internal Audit, Risk, Procurement and HR with the aim to better support the business in achieving these commitments.

## **Responsibilities:**

- Senior Management: Senior management has ultimate responsibility for ensuring that this policy is implemented effectively. They will oversee and approve necessary actions and ensure that appropriate resources are allocated for training and compliance.
- Employees and Contractors: All employees and contractors are responsible for ensuring they do not engage in or support modern slavery practices, and for reporting any suspicions or concerns they may have.
- Suppliers and Partners: All suppliers and partners must comply with this policy and implement appropriate measures to prevent modern slavery within their own operations.

#### Review of Policy:

This policy will be reviewed annually by senior management to ensure its effectiveness and to incorporate any changes in legal requirements, business operations, or industry standards. Updates will be communicated to all employees, contractors, and relevant stakeholders.

**Signature** 

**Anna Bielby** Name

**Position Chief Executive Officer** 

**Date** 09th January, 2025