

Policy 012 -Modern Slavery

Revised January 2025



1. Policy Statement

Vinovius Ltd (“the Company”) is committed to preventing modern slavery and human trafficking in all areas of its business and supply chain. The Company upholds ethical business practices and complies with the UK Modern Slavery Act 2015, ensuring that slavery, forced labour, and human trafficking have no place in its operations.

The Company expects the same high standards from all employees, subcontractors, suppliers, and business partners.

2. Objectives of this Policy

2.1 To prevent and eliminate modern slavery, forced labour, and human trafficking within the Company and its supply chains.

2.2 To raise awareness among employees, subcontractors, and suppliers about modern slavery risks and their responsibilities.

2.3 To ensure compliance with the Modern Slavery Act 2015 and all applicable laws.

3. Designated Officer

Name: Gregory O’Connell

Position: Managing Director

Email: greg.oconnell@vinovius.com

4. Identifying Modern Slavery

Modern slavery can take many forms, including but not limited to:

4.1 Forced Labour – When individuals are forced to work under threat or coercion.

4.2 Human Trafficking – The illegal movement of people for exploitation, including sexual or labour exploitation.

4.3 Debt Bondage – When individuals work to repay a debt under unfair conditions.

4.4 Child Labour – The exploitation of children in any form of work that deprives them of education and well-being.

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5. Responsibilities

The Company requires all employees, subcontractors, and suppliers to:

- 5.1 Be aware of modern slavery risks in their operations and supply chains.
- 5.2 Report any suspected instances of modern slavery immediately.
- 5.3 Conduct due diligence on business partners to prevent involvement in forced labour or human trafficking.

6. Supply Chain Monitoring

The Company will take proactive measures to prevent modern slavery in its supply chain, including:

- 6.1 Conducting risk assessments of suppliers and subcontractors.
- 6.2 Requiring suppliers to confirm compliance with anti-slavery laws.
- 6.3 Auditing suppliers to ensure ethical working conditions.

7. Reporting Concerns

Employees and stakeholders are encouraged to report any concerns regarding modern slavery. Reports can be made confidentially to the Designated Officer or through the Company's whistleblowing mechanism.

8. Training and Awareness

The Company provides training to employees and suppliers to recognize and prevent modern slavery.

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9. Consequences of Breach

Breaches of this Policy may result in disciplinary action, up to and including dismissal. Suppliers and subcontractors found to be engaging in modern slavery will have their contracts terminated, and relevant authorities will be notified.

10. Advice and Support

For further guidance, employees may contact the following organizations:

Modern Slavery Helpline

Helpline: 08000 121 700

Website: www.modernslaveryhelpline.org

Gangmasters and Labour Abuse Authority (GLAA)

Helpline: 0800 432 0804

Website: www.gla.gov.uk

This policy has been approved & authorised by:

Name: Gregory O'Connell

Position: Managing Director

Date: 07/01/2025

Signature:

Greg O'Connell