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# Modern Slavery Policy Statement 2021

## 1 Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps that Vysus Group Holdings Limited (“Vysus”) have taken during the year ending 31 December 2021, to ensure that slavery and human trafficking are not taking place in our supply chains and in any part of our business. Vysus are committed to conducting business in an ethical and sustainable manner which preserves and respects human dignity, complying with all applicable laws and regulations. We undertake practicable steps, including training and due diligence, to ensure that our core values are implemented across all aspects of our operations. In this document we describe our business and supply chain and explain the steps we have taken to mitigate any risks of slavery or human trafficking and how we plan to improve those steps in consideration of the Modern Slavery Act 2015 requirements.

## 2 Vysus Group Organisational Structure

Vysus is a UK company with operational headquarters in Aberdeen and is organised into two global business units aligned to our services and capability

- Wells Management & Moduspec
- Power & Industries

As a global engineering and technical consultancy business of significant breadth we work across a multitude of stakeholder and client partnerships from our offices currently located in 17 countries. Correspondingly our supply chain is required to align to our global portfolio of projects. Historically our supply chain has been managed at a country or regional level.

## 3 Due Diligence and our Supply Chain

Vysus recognise that the challenge of ensuring modern slavery is not committed throughout our supply chain is not only to communicate clearly but also to anticipate, identify, control and manage any such risks and impacts, although as an engineering and technical consultancy business we consider the risk of Modern Slavery existing within our business and supply chain to be low. Therefore, we take a risk-based approach to assessing the likelihood of the existence of Modern Slavery within our supply chain and have proportionate controls and mechanisms in all stages of our operations cycle.

A non-exhaustive example of Vysus suppliers include the provision of contingent labour and other service providers, travel related providers, airlines, hotels and other travel service providers, facilities, IT and IS related goods and services.

## 4 Policy Framework and Controls

Vysus has a zero tolerance approach to Modern Slavery and our Code of Ethics helps us to ensure that we do things safely, ethically and responsibly. Its role is to ensure everyone who works for, or with a member of the Vysus Group understands that unlawful or unethical business practices will not be tolerated.

Vysus is also aligned to the UN Global compact and its ten principles on human rights, labour standards, environment and anti-corruption. We are committed to ensuring that these principles are reflected in our business strategy, day to day operations, organisational culture, sphere of influence and relationship with suppliers.

Our Ethics and Compliance Committee reports to the Board and has ownership of our Code of Ethics and whistle blowing policy, which helps to ensure compliance with legislation including requirements that slavery should not take place within our business or supply chain.

All our employees and contractors are required to comply with this policy safeguarding against Modern Slavery.

Other key Vysus policies associated with safeguarding against Modern Slavery

- Speaking Out

Our whistleblowing facility seeks to ensure that all employees and contractors can raise with the Ethics and Compliance Committee, serious concerns, which they believe indicate malpractice or wrongdoing within Vysus, without fear of being dismissed or otherwise disciplined or jeopardising their position

- Responsible Procurement & Sourcing

We have a policy for our suppliers to commit to fair employment policies, including humane treatment of their employees and no use of child labour, consistent with our commitment to act against any form of Modern Slavery. The principles of this policy focus on environmental, ethical and social responsibility and are anchored in internationally recognised standards, including the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the Global Compact.

## 5 Training

It is crucial that Vysus keep people up to date with their obligations in terms of our Code of Ethics, the need to remain observant and the duty to report wrongdoing or suspicion of wrongdoing. Covid-19 has impacted our ability to implement training however we continue to build knowledge within our people by providing induction on the Group Policies and various intranet-based resources aimed at improving knowledge and skills.

## 6 Key Performance Indicators

Vysus made the following progress against performance targets in 2021:

- Suppliers - Record all decisions to reject suppliers based on a high risk of Modern Slavery.
- Incidents – No Incidents of Modern Slavery reported through our internal reporting mechanisms

## 7 Our Commitments for 2022 and Beyond

In 2022, we will continue to embed our values into all aspects of our business, ensuring all employees understand the potential risks of modern slavery and are aware of how to identify and address areas of concern.

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This statement was approved by the Board of Directors of Vysus Group Holdings Limited, upon recognition of the Modern Slavery Act 2015. This statement covers the year ending 31 December 2021 and will therefore, be reviewed and republished March 2023.

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David Clark

Chief Executive Officer

03rd March 2021