

## Modern Slavery 2018 Statement

This statement sets out the Companies actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and within its supply chain. This statement relates to actions and activities during the financial year 1 January 2018 to 31 December 2018

The Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

The Company maintains relationships with many different organisations in its supply chain and employs people in the UK as well as its subsidiaries in the USA and India.

## Policies

The Company operates the following policies that describe its approach:

- Anti-bribery and Corruption Policy
- Code of Conduct
- Recruitment Policy
- Anti-Slavery and Human Trafficking
- Whistleblowing Policy

## Prevention

All suppliers are deemed at risk of modern-day slavery and will be required to comply with our policies and contractual provisions. All suppliers are managed and controlled centrally by the UK team.

1. All suppliers are required to read and comply with our policy and sign the policy statement declaration form.
2. Contractual provisions have been made for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
3. Where appropriate, we will seek to pre screen suppliers
4. Protection for whistle-blowers

## Training

All our employees are made aware of our policies and procedures. Additional training has been given to our Directors and Managers, HR and purchasing. They include:

VTL Group (Holdings) Ltd.  
St Thomas' Road, Huddersfield, West Yorkshire, HD1 3LG, UK

t: +44 (0) 1484 478 790 f: +44 (0) 1484 478 725 [www.vtl-group.com](http://www.vtl-group.com)

Registered No. 04250061 Registered Name & Address VTL Group (Holdings) Ltd, St Thomas' Road, Huddersfield, West Yorkshire, HD1 3LG, UK

- Modern Slavery training
- Anti-Bribery and corruption training

Awareness is raised via notice boards and our Communications screens.

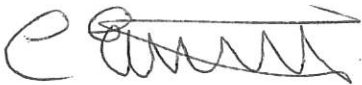
### **Effectiveness**

We use the following indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place. The indicators include:

- Staff awareness
- Staff training
- Investigations undertaken into reports of modern slavery and remedial actions taken
- Ensuring all new suppliers are signed up to our contractual terms and agree to our policies

This statement was approved on 28<sup>th</sup> March 2019 by the organisation's Directors, who review and update it annually.

Signed:

A handwritten signature in black ink, appearing to read "Chris Elliott".

Chris Elliott  
Chief Operating Officer  
Dated: 28.3.19

Signed:

A handwritten signature in blue ink, appearing to read "Bruno Jouan".

Bruno Jouan  
Chief Executive Officer  
Dated: 28.3.19