

# Anti-Slavery and Human Trafficking Policy

Legal

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## Document Owner

Group General Counsel

## Document Approver

Group General Counsel

## Purpose

The purpose of this policy is to outline the principles that support the Groups commitment to a zero-tolerance approach to Modern Slavery and Human Trafficking.

## Applicable Business Name(s) / Location

This document is primarily relevant for the following business(es):

Venterra Group Plc and its Member Companies

## References

Document Title	Document Reference
Code of Conduct	VG-LEG-COD-001
Whistleblowing Policy	VG-LEG-POL-004 (008)
Compliance Framework Policy	VG-LEG-POL-011
Screening and Due Diligence Procedure	VG-LEG-PRO-003

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## 1 Abbreviations and Definitions

Term	Definition
Act	UK Modern Slavery Act 2015
Group	Venterra Group Plc, Venterra Limited and its Member Companies
Human Trafficking	Where a person arranges, or facilitates, the travel of another person with a view to that person being exploited
Managing Director	Managing Director of a Member Company and Engineering Service Lines
Member Company	An operating subsidiary (member company) of Venterra Limited
Modern Slavery	Encompasses slavery, servitude, forced and compulsory labour, bonded and child labour and Human Trafficking
Venterra CEO	Chief Executive Officer of Venterra
Venterra GGC	Group General Counsel of Venterra
Venterra Group	Venterra Group Plc and its subsidiaries but excluding any Member Company

## 2 Introduction

Modern Slavery and Human Trafficking is a serious and organised crime that destroys communities and causes significant harm to victims. It is the illegal exploitation of people for personal or commercial gain, and involves people being coerced and forced into providing a service to others.

Venterra Group and its Member Companies have a zero-tolerance approach to Modern Slavery and Human Trafficking and this policy aims to provide a framework that ensures:

- That Venterra Group and its Member Companies understand and are aware of their responsibilities in relation to Modern Slavery and Human Trafficking.
- The development of a strategic approach to identifying and tackling any Modern Slavery in our supply chains.
- The implementation of robust, transparent, and proportionate governance and assurance processes.
- Reporting of instances or concerns of Modern Slavery.

### 3 Application of this Policy

This policy applies to all Members in the Group incl. all their employees, directors, and officers. Furthermore, it applies to all persons working for us or on our behalf in any capacity, including agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy sets the standards and processes required to be in place for the operations of each Member Company and the Venterra Group. If there are any conflicting terms with any standards, procedures, or policies of each Member Company, then the strictest terms will apply.

If a Managing Director considers that it would not be appropriate to adopt this policy, then they must discuss this with the Group CEO and Group GGC. Furthermore, they must demonstrate that the proposed alternative local policies and control processes meet (or exceed) the same minimum standards as set herein. Any such deviations incl. local policies must also be submitted to [Compliance@venterra-group.com](mailto:Compliance@venterra-group.com) for registration on the Compliance Register once approval has been obtained. It is the responsibility of the Managing Director to ensure that compliance is notified.

### 4 Responsibilities

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The General Counsel and Compliance Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering Modern Slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of Modern Slavery in supply chains.

Employees conducting screening and due diligence on third parties must conduct a Modern Slavery assessment in accordance with our Screening and Due Diligence Procedure if a contractor who supply goods or services is deemed to be at particular risk of Modern Slavery.

Everyone subject to this policy must:

- Read, understand, and comply with this policy.
- Notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- Report any actual or suspected breaches it in accordance with Section 8 below.
- Raise concerns with your manager or a director, or through the confidential hotline, if you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of Modern Slavery.

#### 4.1 Breach of Policy

Venterra Group and its Member Companies takes breaches of our policies and procedures seriously. The consequences for breaching this policy depend on the severity of the breach but may range from a warning to termination of employment. In certain instances, there may also be civil and/or criminal liability.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## 5 Policy Statement

Venterra Group and its Member Companies have a zero-tolerance approach to Modern Slavery and Human Trafficking, 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.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our clients, contractors, suppliers, and other business partners.

### 5.1 Supply Chain

As part of our contracting processes, we will seek to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

If a contractor who supply goods or services to us is deemed to be at particular risk of Modern Slavery or Human Trafficking (e.g. due to industry or area – see the [Global Slavery Index](#)), then they must complete a Modern Slavery Assessment as part of the Screening and Due Diligence Procedure.

Member Companies may require contractors who engage workers through a third party to obtain that third party agreement and ensure it adheres to this policy and demonstrate how they seek to tackle any Modern Slavery in their supply chain.

### 5.2 Identifying Victims

Identifying potential victims of modern slavery can be challenging due to the various forms this crime can take. The spectrum of abuse ranges widely, and it is not always evident when poor working practices and a lack of health and safety awareness escalate into human trafficking, slavery, or forced labour within a work environment. Additionally, some suppliers may go to great lengths to conceal their use of slave labour. However, we acknowledge our responsibility to ensure workers are not exploited, are safe, and that all employment, health and safety, and human rights laws and standards are adhered to, including the freedom of movement and communication, through our due diligence processes.

Preventing, detecting, and reporting modern slavery within any part of our business and supply chains, whether in the UK or abroad, is the responsibility of everyone working for us and under our control. You are required to avoid any activities that might lead to a breach of this policy and to promptly raise or report any concerns.

## 6 Assurance and Transparency

We take a risk-based approach to our procurement, contract management and supply chain management processes in relation to Modern Slavery and keep them under continuous review.

As part of ongoing risk assessment and due diligence, the individual member companies will consider whether circumstances warrant the auditing of contractors to demonstrate their compliance with this policy.

To supplement this policy, Venterra will voluntarily publish an annual statement for each financial year that includes details of activities undertaken by the Group and its supply chain to combat Modern Slavery.

## 7 Communication and Training

Training on this policy and how to spot Modern Slavery in supply chains forms part of the induction process for all individuals who work for us. Training will be provided by the Legal and Compliance Team.

Our zero-tolerance approach to addressing the issue of Modern Slavery in our business and supply chains must be communicated to all clients, suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 8 Whistleblowing

Venterra Group and its Member Companies are committed to an open, ethical, and safe business environment where its workforce feels able to speak up about any perceived unsafe or unethical practices.

We encouraged you to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

The Whistleblowing Policy sets out Venterra’s commitment to supporting an open culture where reports can be made confidentially and without fear of reprisals (whether to a line manager, another manager, an executive or the Executive Chair of Venterra or anonymously).

### 8.1 Reporting and Victim Support

If you hold information that could lead to the identification, discovery, and recovery of victims of Modern Slavery or Human Trafficking in the UK, then contact the Modern Slavery Helpline on 080 0012 1700 (open 24/7) or report it to the [Modern Slavery Helpline](#).

If you think that you are a victim of Modern Slavery or Human Trafficking, then contact:

- the Modern Slavery Helpline on 080 0012 1700 (open 24/7) or report it to the [Modern Slavery Helpline](#).
- the Victim Support Helpline on 080 8168 9111.
- Visit the [Victim Support website](#).

Should you be outside of the UK, then please visit the European Union’s Migration and home affairs homepage to find your [National Reporting Hotline](#).

## 9 Change History

Date	Version	Changes
16/4/2023	1	Approved for Use
04/07/2024	2	Updated to reflect due diligence procedure, section on identifying victims and reporting and victim support.