

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

INTRODUCTION

The Company is committed to complying with existing national and local laws and regulations including, but not limited to, those relating to slavery, human trafficking, forced labour, child labour, immigration, data protection, health and safety and the environment.

We are also committed to ensuring, as far as practicable, that its supply chain value people too and by doing so, do not use slave labour or engage in our support slavery or human trafficking. Suppliers are expected to fully comply with all applicable national and local laws and regulations and the requirements of this policy.

SCOPE AND APPLICABILITY

This policy applies to all VIVALDA Group of companies.

If there is any conflict between this document and applicable legislation within the country of operational activity, then the country legislation shall take precedence over this document. In cases where this document is more rigorous than any applicable legislation, this document shall take precedence over any such country legislation.

POLICY

The Company aims to develop relationships with our supply chain based on mutual trust and all dealings will be conducted in a professional manner at all times. We will request that suppliers acknowledge that they and their subcontractors, are compliant with national and local legislation in order to increase sustainability, environmental and ethical best practice within the supply chain and encourage this through regular engagement.

Given the market in which VIVALDA Group of companies operates and the nature of the products and services supplied, the risks of slavery, human trafficking, forced labour and child labour are deemed low as the products sourced are from well-known manufacturing suppliers.

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The Company verify supply chains in order to evaluate the risks of slave labour or human trafficking. VIVALDA Group of companies do not generally audit suppliers to evaluate supplier or subcontractor compliance, however we retain the right to conduct periodic and ad hoc supplier reviews which will include but are not limited to, contracts and SLA's, information security, health and safety and the environment.

The Company will promptly and thoroughly investigate any claims or indications that a supplier is engaging with human trafficking, or slave labour or is otherwise not complying with this policy. We will not continue to purchase goods or services from any supplier that is found to be engaging in human trafficking or using slave labour within its supply chain.

Vivalda Group of companies and the Human Resources Department will ensure original documents are presented to verify identity and the right to work in the UK.

Signed:



Group HR Director

Dated: 01/04/2023