



# Modern Slavery Policy

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# Document Information

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| <b>Prepared by:</b>          | Michelle Chalmers on 27 January 2025                                      |
| <b>Reviewed by:</b>          | Lisa Mackie on 10 March 2025  |
| <b>Authorized by:</b>        | Thomas Aas Saethre on 10 March 2025                                       |
| <b>Document description:</b> | To provide a framework for top management's commitment to Modern Slavery. |

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## Policy

### Policy Overview

This Modern Slavery Policy outlines our commitment to identifying, addressing, and preventing modern slavery and human trafficking in all our operations and supply chains. It reflects our dedication to ethical business practices and compliance with relevant legislation, including the Modern Slavery Act 2015.

Vysus Group strictly prohibits all forms of modern slavery, including forced labor, bonded labor, child labor, and human trafficking. We 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 commit to undertaking practicable steps, including training and due diligence, to ensure that our core values are implemented across all aspects of our operations.

### Policy Principles

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 principles on human rights, labour standards, environment and anti-corruption. We are committed to ensuring that these principles are reflected in our business strategy, our operations, organisational culture, sphere of influence and relationship with our suppliers.

Our Ethics and Compliance Committee reports to the Board and has ownership of our Code of Ethics and whistle blowing process, which aims to help 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 are:

### 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

Concerns about Modern Slavery can be reported via [ethics@vysusgroup.com](mailto:ethics@vysusgroup.com). Reports will be treated confidentially and investigated promptly. Vysus Group prohibits retaliation against individuals who report concerns in good faith.

### Responsible Procurement & Sourcing

We strive to make a positive contribution to society wherever we operate. In support of this aim and to live by our core values of Trust, Partnership, and Passion, we have developed principles to extend these standards to our supply chain.

Our Responsible Procurement & Sourcing policy sets out principles and standards 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 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.

## Due Diligence and Supply Chain

Vysus Group 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.

## Training

It is crucial that Vysus keep people up to date with their obligations in terms of our Code of Ethics (VMS-LGL-POL-001), 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 Vysus Group Policies and various intranet-based resources aimed at improving knowledge and skills.

Authorised by

Thomas Aas Saethre,  
Chief Executive Officer

A handwritten signature in blue ink, appearing to read 'TAS' followed by a flourish.

10 March 2025

Vysus Group Holdings Limited