



Introduction

This statement sets out the VVB Group’s and its subsidiary companies’ (including VVB Engineering (UK) Ltd) actions to understand all potential modern slavery risks related to its business in accordance with the Modern Slavery Act 2015. It details the steps put in place to ensure that there is no modern slavery or human trafficking in the Company’s own business and its supply chains. This statement relates to actions and activities during the financial year for the period ending 31st December 2024.

Our Company

The vision of VVB Group (including VVB Engineering (UK) Ltd.) is to deliver sustainable Mechanical, Electrical, Fire and Telecommunication engineering solutions for our clients, our people, and our environment. We are making continual efforts to understand, raise awareness and engage with our employees and supply chain around the risks of modern slavery.

Modern slavery is a crime and a violation of fundamental human rights and takes various forms; slavery, servitude, forced and compulsory labour and human trafficking, all of which deprive a person’s liberty by another to exploit them for personal or commercial gain.

As part of the Engineering and Construction Sector, VVB recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The Company is committed to responsible operations, particularly regarding human rights issues and have a zero-tolerance approach to human trafficking and other forms of slavery within our operations and throughout our supply chains.

Our Supply Chain

At VVB, maintaining a high-quality supply chain is key to ensuring modern slavery and human trafficking do not take place. Our approach to supplier governance goes through two assessment routes:

- Internally – via a subcontractor questionnaire (PQQ) through A-Site
- Externally – through the Achilles accreditation scheme (Building Confidence or UVDB) and Constructionline

Through this, we assess suppliers against an array of standards, including modern slavery and human trafficking, ensuring that our business and supply chains always act ethically and with integrity.

Relevant Policies

Unethical labour practices including modern slavery and human trafficking are often hidden and the signs can be difficult to spot. VVB have several policies designed to manage and mitigate against modern slavery and human trafficking. These policies are continually assessed for responsible business practices to maintain and control governance to ensure modern slavery and human trafficking are not taking place in our business or across our supply chain. As a result of this, we ensure our policies and procedures are robust so that our operations meet our standards of practice.

The following relevant policies support our zero-tolerance approach to modern slavery and human trafficking:

- Whistleblowing Policy - VVB-POL-HR-003
- Responsible Procurement Policy - VVB-POL-SSW-011
- Sustainability Policy - VVB-POL-SSW-004
- Recruitment and Selection Policy - VVB-POL-HR-013
- Modern Slavery Statement - VVB-POL-SSW-010

Our approach to assessing and managing modern slavery and human trafficking risk

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Modern slavery and human trafficking awareness is increasingly incorporated into VVB operations through the following actions:

- If our workers have any concerns or suspect any incidents of unfair treatment either within our business or supply chain, they are empowered and expected to spot the signs and report concerns as identified in our Whistleblowing Policy or through our SpeakUp function on Notify. This provides a confidential mechanism for our employees and others working within our supply chain to report suspected modern slavery practices.
- Regular Toolbox Talks are encouraged and presented on spotting the signs of Modern Slavery and how to report any concerns. Our workers are encouraged to make full use of available resources for best practice from the Supply Chain Sustainability School and Business in the Community.
- All recruitment/labour agencies are verified through a stringent assessment process.

Next Steps

VVB will continue to monitor the effectiveness of our actions against modern slavery and human trafficking and continue to raise awareness throughout the Company by:

- Continuing to review and update our related procurement standards and Responsible Procurement Policy.
- Continuing to review our pre-qualification standards on A-Site for the appointment of new suppliers and subcontractors, through our supply chain.
- Continuing to train employees on identifying potential modern slavery and human trafficking within our operations and supply chain, including through the completion of our mandatory Modern Slavery E-Learning which is incorporated into the on-boarding process for all new starters.
- Continuing to assess the risks of modern slavery and human trafficking in our business and our supply chain.
- Continuing to share best practice to help raise awareness and reduce risk.
- Develop and review our current portfolio of site-based Toolbox Talks.

This statement is made in pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes VVB's slavery and human trafficking statement for the financial year ending 31st December 2023 with approval by the Board of the VVB Group.

Signed:

Issue Date: 21st May 2024

Andrew Jellis – CEO (Chief Executive Officer)

Review Date: 20th May 2025

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