

## **Modern slavery statement 2024**

### **Organisation**

This statement applies to VantagePoint Holdings Group (referred to in this statement as “the Organisation”). The information included in the statement refers to the financial year 2024.

### **Our policy**

Our policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains. We also expect organisations we transact with to adopt and enforce policies to comply with legislation. We support our people and clients to address issues arising from modern slavery. We ensure:

- our values, which are embedded throughout our business, set the parameters for how we expect our people to behave with colleagues, clients and society
- we seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted
- our policies and procedures relating to the Act are aligned with our culture and values.

### **Our Structure**

VantagePoint Holdings Limited is a member company of VantagePoint Holdings Limited Group, an international network of member companies across 7 countries. Each of the member companies operates as a separate legal entity; and is not a worldwide partnership. This statement relates to the UK entity, VantagePoint Holdings Limited, its structure and supply chain. The VantagePoint Holdings Group has raised awareness of modern slavery through its Legal entities and will continue to do so on any related areas through periodic global updates.

### **Definitions**

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

### **Commitment**

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in The USA, The UK, Singapore, Romania, Norway, BeNeLux and Australia.

## Employment

- Employment policies that protect our people from unfair treatment and promote a fair and inclusive workplace
- Robust and ethical recruitment processes in line with UK employment laws, including: 'right to work' document checks (we operate these in line with GDPR and will not retain identity documents for longer than is necessary); contracts of employment and checks to ensure everyone employed is 16 and above
- Market-related pay and rewards reviewed annually
- Wellbeing strategy and initiatives to support our people's physical and mental wellbeing and lifestyle choices

## Supply chains

We recognise our Company is exposed to greater risk when dealing with its suppliers, particularly those who have operations/suppliers in other territories. The following measures are in place to review and manage the risk:

- a Third Party Code of Contact is in place, used for all new major suppliers of goods or in re-tendering, clearly stating the company's intention to step away (without penalty) if any occurrences of modern slavery are discovered and/or ignored. – This includes an expectation for our Third Parties to pay their employees the living wage
- our commitment to collaborate closely with suppliers to help them understand and work towards their own compliance with the Act

## Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- measures in place to identify and assess the potential risks in its supply chains
- undertaking impact assessments of its services upon potential instances of slavery
- creating action plans to address risk to modern slavery
- any actions taken to embed a zero tolerance policy towards modern slavery
- any training provided to staff on modern slavery.

## Supporting our people

Following the Act, we have increased our people's awareness of this important issue by outlining specific actions our Company has taken. We also provide guidance to enable people to report any potential concerns within business or personal contexts. We have:

- developed and shared resources, including summary documents with an overview of the Act, and links to the [modernslavery.co.uk](https://www.modernslavery.co.uk) website

- signposted our people to [modernslavery.co.uk](https://modernslavery.co.uk) to provide them with useful information on how to recognise different types of slavery, how to spot the signs and details of their telephone helpline
- included training on our modern slavery policy in our mandatory Quality Matters training
- an internal whistleblowing hotline to enable anyone who has concerns (for example, how suppliers, clients, Directors or employees behave) to raise these confidentially
- reviewed our people policies to ensure compliance with human rights.

### **Supporting our clients**

We continuously review how to support clients. This includes collaborating with government agencies and other reputable organisations to deepen and share knowledge so that we collectively address this challenge. In addition, to help our clients to:

- develop a modern slavery statement
- conduct supply chain mapping
- carry out supplier due diligence and routine spot checks
- develop any policies and practices clients may have in place.

### **Slavery Compliance Officer**

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.



Signed:

Print name: Matt Benaron

Job Title: Chief Executive Officer

Updated July 2024