

1. Introduction and Policy Statement

The Modern Slavery Act 2015 (the 'Act') mandates that companies with an annual turnover equal to or exceeding an amount set by the secretary of state, currently £36 million prepare a slavery and human trafficking statement each financial year. Vertex to not currently meet this threshold so are not required to provide a statement, however we are committed to ensuring compliance with the requirements of the Modern Slavery Act 2015.

Modern slavery and human trafficking in all their various forms are a crime in the UK and much of the world and a violation of fundamental human rights.

Vertex Services Group have a zero-tolerance approach to modern slavery and human trafficking and are committed to acting ethically and with integrity in all activities and business relationships and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery.

2. Definition of Human Trafficking

Human trafficking involves men, women and children being recruited, harboured or brought into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will. People can be trafficked for many different forms of exploitation such as forced prostitution, forced labour, forced begging, forced criminality, domestic servitude, forced marriage, forced organ removal, etc.

Contrary to common misconception, people don't necessarily have to be transported from one place to another for trafficking to take place.

People trafficking and people smuggling are often confused. People smuggling is the illegal movement of people across international border for a fee and upon arrival in the country of destination the smuggled person is free.

People trafficking is fundamentally different as the trafficker is facilitating the movement of that person for the purpose of exploitation. There is no need for an international border to be crossed in cases of trafficking, it occurs also nationally, even within one community.

3. Our Business

The economic, social and environmental footprint of our business activity is a fundamental consideration within Vertex Services Group commitment to responsible and sustainable business growth.

4. Responsibility for The Policy

The Directors and senior management team of Vertex Services Group have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us, or on our behalf, in any capacity comply with it.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us, or on our behalf, in any capacity (including our employees, suppliers, contractors, workers, directors and agents) .

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.

5. Commitment

Vertex Services Group are implementing and enforcing a number of measures, policies and controls both internally and externally to ensure compliance with the requirements of the Modern Slavery Act 2015:

Training on this policy and the risk our business faces from Modern Slavery and Human Trafficking forms part of the induction process for all individuals joining the business. Regular refresher training will be provided for management.

Vertex Services Group Supplier's Charter and Terms and Conditions of Purchase have been amended to encompass Modern Slavery and Human Trafficking and copies are available to our suppliers on request.

6. Compliance

All persons working for us, or on our behalf, in any capacity must:

Read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy;

Notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future; and

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.

7. Breaches of Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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

8. Ongoing Review

Vertex Services Group will review both its supply chains and external operations and its internal operations on an ongoing basis to check compliance with the above policy, and to check that our policy is being implemented effectively.



Wayne Tantrum
Managing
Director
08/09/2021