

## **MODERN SLAVERY POLICY**

### **Policy Statement**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships.

We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other compliance with this policy and the Modern Slavery Act 2015 and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### **Responsibility for the Policy**

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

HR has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. All staff are trained in modern slavery awareness and are aware of some of the typical characteristics of the practice. On completion of the Modern Slavery training module, employees are required to sign for the latest version of the policy by way of confirmation and understanding.

Employees are provided with adequate and regular communications on the subject and how the practice may be evident in supply chains. They are encouraged to remain vigilant, particularly when visiting site(s) which are managed by a third party.

### **Warning Signs**

Below is a list of warning signs to look out for (not an exhaustive list):

- Physical appearance – signs of abuse, looking malnourished or appear withdrawn
- Isolation – Rarely working alone, seemingly under the control or influence of another and rarely interacting with others
- Poor living conditions and suspicions of them living at the same address that they work

- Few personal possessions and wearing the same clothing again and again, sometimes clothing unfit for the work they are undertaking
- Unusual and long working hours with little or no break
- Avoiding eye contact, appearing frightened etc.

### **High Risk Activity**

Viridian has taken steps to identify any potential high-risk activity within their scope of works. Many of these may not be directly within our operations, however, they may be carried out by our suppliers, or by others working on the same projects as us, and therefore it is essential we are aware and prepared:

- Corporate procurements - Office suppliers and travel arrangements
- Operations, including building services - security, installations, cleaning and maintenance
- Raw Materials and goods not for resale - long and complex supply chains can result in poor visibility
- High demand for low skilled labour force; including but not limited to outsourcing labour, seasonal employment, and labourers on temporary visas.

Our Supplier Questionnaire requests that companies we work with have a Modern Slavery Policy in place for them to be approved, and, where necessary, suppliers may be asked to complete the gov.uk Modern Slavery Assessment Tool - <https://supplierregistration.cabinetoffice.gov.uk/msat>

### **Compliance with the Policy**

All employees, agency workers, seconded workers, volunteers, contractors, external consultants, third-party representatives, and business partners (“You”) must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to a breach of this policy.

You must notify HR as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to 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. To try and minimise any further dangers or distress to the individual involved, you should not tell any potential victims of your concerns or actions you may take.

If you believe an individual is in immediate danger with a risk to life, you must call 999 as soon as it is safe to do so.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with HR.

Further information can be found on the Modern Slavery Helpline site, part of the 'Unseen' charity - <https://www.modernslaveryhelpline.org/>

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure,

### **Breaches of the Policy**

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

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