



Modern Day Slavery Policy



Vyta Modern Day Slavery Policy

Contents

1. Scope	2
2. Responsibilities.....	2
3. Purpose	2
4. Policy Statement.....	3
5. Risk Assessment and Due Diligence.....	3
6. Procurement and Supply Chain	4
7. Recruitment and Employment Practices	5
8. Competency, Awareness and Training.....	5
9. Reporting, Recording and Transparency	5
10. Objectives and Targets.....	6
11. Monitoring and Reporting	6
12. Continuous Improvement	6
13. Policy Approval and Review	7



1. Scope

This policy applies to all Senior Managers, Managers, Employees and Temporary Staff of Vyta as well as contractors and Suppliers that provide resources for or on behalf of Vyta.

2. Responsibilities

- **Board / Governing Body:** Defines direction, approves risk strategy, receives reports.
- **Senior Management:** Implements controls, ensures resources, integrates modern slavery risk into processes.
- **Managers:** Ensure awareness and compliance within teams; support HR and procurement due diligence.
- **All Workers:** Must understand, recognise, and report risks of modern slavery.
- **Suppliers:** Must comply with this policy and evidence their own modern slavery controls.

3. Purpose

- Modern slavery is a criminal offence within the UK and European Union, Vyta operate in these areas and abide by the law in which the operational site is based.
- Modern slavery can occur in various forms, including servitude, forced or compulsory labour, 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 are 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 Act. We expect the same high standards from all of supply chain and other business partners. We will work to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers, subcontractors and downstream vendors ("supply chain").



4. Policy Statement

- We have **zero tolerance** for any form of modern slavery, forced labour, human trafficking, debt bondage, or severe labour exploitation within our business or supply chain.
- We will:
 - Ensure adherence to local and national laws
 - Prevent exploitation wherever possible.
 - Identify, analyse, and evaluate modern slavery risks.
 - Take immediate action where risks or actual cases are identified.
 - Provide remedy to affected individuals, including collaboration with external experts where appropriate.
- Vyta Secure Ltd (Vyta) has a zero-tolerance approach to modern slavery within both our Company and our supply chain, in line with our commitment to United Nations Sustainability Goal 8- Decent Work and Economic Growth. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.
- Our Code of Conduct & Business Ethics Policy in conjunction with our Human Rights Policy and this policy strictly prohibits the use of modern slavery, human trafficking, child labour and forced labour. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. The policy also includes reporting requirements.

5. Risk Assessment and Due Diligence

- Following BS 25700, we will adopt a risk-based approach to identify and prioritise modern slavery risks.
- Our risk assessment process includes:
 - Country-, sector-, supplier- and workforce-based risk analysis.
 - Assessment of recruitment channels and supply chain tiers.
 - Evaluation of human-rights vulnerabilities across operations.
 - Types of Work
 - High Risk Sectors
- Due diligence includes:
 - Supplier pre-qualification screening.
 - Social audits where appropriate.
 - Remediation protocols when risks or incidents are identified

6. Procurement and Supply Chain

- Our supplier selection process does not permit the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We require our suppliers to hold their own suppliers to the same high standards.
- Geography and industry will both be considered when assessing the risk in our supply chain. We will utilise external sources such as the Global Slavery Index, the International Labour Organization Composite Score, and the Global Rights Index, as well as guidance from NGOs, governments, and media coverage, for guidance.
- Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To mitigate this risk and underpin our compliance with practical steps, we work to the following measures:
 - We engage with our suppliers both to convey to them our Modern Day Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their own businesses and their supply chain.
 - Our due diligence by process includes the use of supplier pre-screening and self-reporting on safeguarding controls. We will continue to enhance this screening and reporting according to best practice and changes within our industry.
 - We will introduce provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
 - As a business, we will alert the proper authorities in instances where we believe a credible instance of Modern Slavery has taken place within our supply chain.
- We commit to:
 - Embedding modern slavery criteria in procurement decisions.
 - Requiring suppliers to adhere to this policy and—to the extent possible
 - Ongoing contract monitoring and supplier engagement, not once-off checks.
 - Terminating relationships with suppliers failing to meet minimum labour-rights expectations, where remediation is not possible.
- We will endeavour to reduce the risk of Modern-day slavery through undue pressure within our purchasing practices by assessing the following aspects:
 - Aggressive pricing that does not consider sustainable production costs.
 - Short lead times
 - Late High-Volume Orders
 - Inaccurate forecasting
 - Late or extended payments
 - Last minute contract withdrawals
 - Unfair penalties for not meeting orders despite last minute changes

- Inaccurate technical specifications

7. Recruitment and Employment Practices

- To maintain consistent with BS25700 provisions for ethical recruitment:
 - No recruitment fees charged to workers.
 - Workers are not trapped into debt bondage
 - Transparent employment terms provided in a language the worker understands.
 - Verification of identity, right to work, and freedom from coercion.
 - Robust controls around agency and migrant labour.
 - Freedom of workers to terminate employment
 - Prohibit the use of worker paid recruitment fees
 - Prohibit forced compulsory overtime
 - Prohibits the confiscation of workers original identification documents
 - Permit freedom of movement and association
 - Prohibit any threat of violence, harassment and intimidation

8. Competency, Awareness and Training

- Vyta emphasises relevant personnel must demonstrate competence and receive continuous training, to achieve and maintain this, we:
 - Provide mandatory training for key functions (HR, procurement, operations, compliance).
 - Ensure our induction and continuation training materials include modern slavery awareness.
 - Maintain competency frameworks for roles managing modern slavery risk.
- 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 because of reporting in good faith.

9. Reporting, Recording and Transparency

- Every Allegation of Modern-day slavery will be investigated, promptly and documented.
- Employees and third parties can report concerns confidentially and without risk of retribution.
- We will assess effectiveness of our Risk Management annually
- Where legally and or Stakeholder required, we will publish an annual Modern Slavery Statement



10. Objectives and Targets

- To ensure continuous improvement and alignment with our Policy commitments, Vyta establishes measurable objectives and targets for. These targets are documented in the **Vyta Objectives & KPI Plan**, which is aligned to the relevant policy, these are reviewed and updated annually.
- The plan includes:
 - Specific, measurable goals linked to this policy
 - Timelines and responsible parties
 - Progress monitoring and reporting mechanisms

11. Monitoring and Reporting

- KPIs:
 - Tracked monthly in a QESS dashboard; reviewed by the Executive Team quarterly.
- Audits
 - Planned internal audits, covering all our legal obligations and accreditation requirements.
 - Semi-annual audits for ISO 9001/14001/45001 / 27001 / 14068, ADISA and R2v3; annual external certification audits.
- Incident & Nonconformity Management:
 - Root cause analysis (5Why, Ishikawa), CAPA tracking, effectiveness verification.
- Stakeholder Reporting
 - Publish an annual Sustainability Report with targets, performance, and assurance statement.
- Whistleblowing & Grievance
 - Confidential channels for employees and suppliers; non-retaliation guaranteed.

12. Continuous Improvement

- Use **P-D-C-A** (Plan-Do-Check-Act) to drive improvements; set annual objectives.
- Engage employees through kaizen ideas, recognition programs, and cross functional improvement projects.



13. Policy Approval and Review

- This policy is approved by Executive management and is reviewed annually or when significant changes occur in business operations or legal frameworks.