

### Company Structure

Vision Modular Systems UK Ltd, manufactures volumetric 3D structural modules for the Construction Industry to be used in sectors such as Hotels, Residential Apartment Buildings, and Student Accommodation

We work closely with a number of suppliers and subcontractors. Many of these businesses operate within the UK and this statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015, setting out the steps we believe will mitigate our risk with respect to slavery and human trafficking.

### Policy Statement

Modern Slavery is a serious crime, violating an individual's fundamental rights. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This Anti-slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or our supply chains.

We are committed to acting in an ethical manner. With integrity and transparency being a key value in all business dealings, we apply these values also to our zero tolerance to slavery and human trafficking. In order to ensure all those in our supply chain comply with our values, we require our supply chain to contractually commit to compliance with this Policy Statement.

Our recruitment processes are thorough. We pride ourselves in our staff and we have robust procedures in place for vetting new employees. We ensure that we are able to accurately confirm their identities.

### Supply Chain

As part of Vision Modular Systems UK Ltd's on-going commitment to comply with the Modern Slavery Act, 2015, Vision will both continue to monitor and mitigate any risks within both within our own company and our supply chain, so that effective controls and contingency plans can be put in place if required.

We ensure our Supply Chain Prequalification procedures are robust and include appropriate provision for ascertaining the measures taken by our supply chain to help eradicate modern slavery. Our procedural controls are reinforced by our strategic procurement approach to developing preferred supplier relationships with key supply chain partners, including for example labour and logistics providers with whom we work repeatedly and know very well. As part of our strategic relationship, these providers continue to actively support Vision in raising internal awareness on the risks of modern slavery.

## MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

We will also undertake Labour Practice Audits across a selected batch of suppliers and/or trade contractors, through one of our partner entities. These will continue in 2019. We will work with our supply chain in relation to any points of awareness that arise in the audits.

The success of this Policy Statement is dependent upon all employees, supply chains and subcontractors playing an important part in helping to detect and eradicate slavery. As such, all individuals are encouraged to report any suspected slavery immediately to management.

### Training

To ensure a clear understanding of the Modern Slavery Act 2015 and the risks, we have rolled out training to relevant members of staff. The training will continue through regular updates.

### Internal Policies

This Policy Statement is supported by our internal policies which assist in ensuring that we conduct our business in a transparent manner, implementing effective controls to, for example, promote equal opportunities. These policies implement effective systems to ensure, as far as is practical, that human trafficking and slavery are not taking place in Vision Modular Systems UK Ltd or any of our supply chain.

### Summary

This statement is made pursuant to s.54(1) of the Modern Slavery Act 2015 and serves as our Modern Slavery and Human Trafficking statement for the year ending 28<sup>th</sup> February 2019. This statement will be reviewed annually.

Signed:   
Chris Hayes  
Director

4<sup>th</sup> March 2019