

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Introduction

Per the (UK) Modern Slavery Act 2015 all bodies corporate and partnerships who (irrespective of where they are incorporated) (1) carry on a business, or part of a business, in the UK supplying goods or services, and (2) have a consolidated global turnover of above £36 million (or Euro equivalent) per annum, are required to prepare and publish an annual "Slavery and Human Trafficking Statement".¹

This statement must set out the measures an organisation has taken during its financial year to ensure that slavery or human trafficking is not taking place in any of its supply chains or within itself.

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.

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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.

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

We want to help our employees, partners, clients, and suppliers to understand more about these issues and understand how to report any suspicions they may have related to modern slavery and human trafficking.

The topic of Modern Slavery, and our associated Anti-Slavery and Human Trafficking Policy, continues to be flagged in the induction training undertaken by new staff members starting with Vision Modular Systems UK Ltd.

We flag each update of this Statement and of the associated Anti-Slavery and Human Trafficking Policy to all staff members.

We continue to consider on an ongoing basis, ways to further enhance awareness on the issues of slavery and human trafficking and of Vision Modular Systems UK Ltd Anti-Slavery and Human Trafficking Policy among relevant employees and partners.

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.

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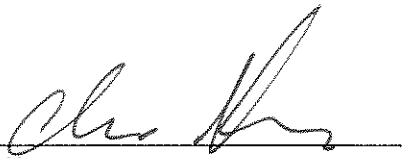
Summary

Vision Modular Systems UK Ltd will continue to develop and implement the measures mentioned above in respect of our supply chain.

Our approach to modern slavery and human trafficking risk will continue to evolve and we will continue to mitigate these risks through the provisions mentioned above during 2021 and beyond.

Vision Modular Systems UK Ltd shall take responsibility for this statement and its objectives, and this statement will be reviewed and updated as appropriate

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 30 November 2021.

Signed: 
Christy Hayes
Director

01 December 2020