

Statement

Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking, and has been identified as a violation of fundamental human rights.

Venn Group (the “Company”, “we”) has a zero tolerance approach to modern slavery and human trafficking. We are committed to acting responsibly and ethically in our business dealings and have effective systems and controls in place to ensure modern slavery is not taking place anywhere within our business or any of our supply chains.

The Company is committed to acting in accordance with its disclosure obligations under the Modern Slavery Act 2015 (‘MSA’) and expects the same of its contractors, suppliers and other business partners.

Anti-slavery and human trafficking policy

1. Responsibility for the policy

1.1 The overall responsibility for implementing and ensuring this policy complies with the Company’s legal and ethical obligations, including those under the Company’s control, lies with Philip Hanna, Managing Director.

1.2 The person in our organization with overall responsibility for ensuring all necessary steps are taken to combat slavery and human trafficking is Philip Hanna, Managing Director. Any queries or comments relating to this policy or suggestions for improvement should be forwarded to Kirsty MacDougall, Head of HR kmacdougall@venngroup.com

2. Compliance

2.1 Employees must ensure they read, understand and comply with this policy. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

2.2 Employees are expected to comply with all relevant processes as notified to them from time to time.

2.3 Employees must notify Kirsty MacDougall, Head of HR kmacdougall@venngroup.com as soon as possible if they believe or suspect a breach of this policy has occurred or will occur in the future, in accordance with the Company’s Whistleblowing Policy which can be found on our intranet.

2.4 Employees should contact Kirsty MacDougall, Head of HR kmacdougall@venngroup.com if there is any uncertainty over whether an issue, incident and/or practice constitutes any of the various forms of modern slavery.

2.5 Employees should report any suspicions a candidate, or other person with whom they have come into contact, may be a victim of modern slavery or may have committed a modern slavery offence to Kirsty MacDougall, Head of HR kmacdougall@avenngroup.com.

2.6 Employees that raise genuine concerns in good faith (even if they turn out to be mistaken) under this policy are protected from detrimental treatment including dismissal, disciplinary action, threats, or other unfavorable treatment due to having made the disclosure. If an employee believes he or she has suffered any such treatment he or she should raise a grievance in accordance with the Company’s Grievance Policy and Procedure which can be found on the intranet.

3. Processes

3.1 The Company already has in place a number of internal processes for ensuring compliance, particularly relating to the registration of candidates. Many of the processes assist in preventing modern slavery and human

trafficking, including ID and background checks, obtaining references, checking on right to work in the UK and working only with suppliers approved or verified by the Company.

3.2 The Company will continue to monitor the risk of modern slavery in its business and supply chains and take appropriate steps to minimise the risk of modern slavery in its business and supply chains.

4. Communication and awareness

4.1 Training on this policy forms part of the induction process for all individuals who work for the Company and regular training will be provided as appropriate.

4.2 Employees are expected to be vigilant and to be aware of the risk of modern slavery, particularly when registering candidates or dealing with suppliers.

4.3 The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset and reinforced throughout the business relationship as appropriate.

5. Enforcement

5.1 Employees who breach this policy will be subject to disciplinary action in accordance with the Company's Disciplinary Policy and Procedure which can be found in on the intranet.

5.2 The Company may terminate its relationship with other individuals and organisations working on its behalf if they are in breach of this policy.

Signed:



Dated: 27/6/17