Slavery and Human Trafficking Statement

Introduction

1. We are Venn Group Ltd of 1 London Bridge, London, SE1 9BG. References to "we", "us" and "our" are to Venn Group Ltd.
2. This Slavery and Human Trafficking Statement is made for the financial year 2025, in accordance with Section 54, Part 6 of the Modern Slavery Act 2015 ("MSA").
3. Modern slavery is a violation of fundamental human rights and encompasses slavery, servitude, forced and compulsory labour and human trafficking.
4. We have a zero-tolerance approach to modern slavery and this statement sets out the steps we are taking to minimise the risk of slavery and human trafficking taking place in any part of our business or in any part of our supply chain.
5. We continually review and modify our policies, processes and procedures to ensure they address the risks posed by modern slavery, including:
    - training for all employees
    - reporting processes
    - policies such as Anti-Slavery and Human Trafficking and Whistleblowing
    - assessing steps taken by existing and potential suppliers to combat modern slavery
    - compiling a list of approved suppliers verified by us as having taken appropriate steps to combat modern slavery within their businesses and supply chains
6. The person in our organisation with overall responsibility for ensuring all necessary steps are taken to combat slavery and human trafficking is Keith Wilmott, Chief Financial Officer. All enquiries or comments about this statement should initially be directed to hr@venngroup.com.

Our business structure

7. We operate within the recruitment sector in the UK and we act as an employment agency and employment business. We provide recruitment services to our clients, namely introducing and supplying personnel to clients in various sectors including Finance, Engineering and Infrastructure, Government & Not for Profit, Health & Life Sciences, Housing, Legal and Technology.
8. We have over 182 employees and have an annual turnover of approximately £123 million.
9. Our suppliers and contractors are predominantly UK based.
10. Our supply chains consist of:
    - suppliers of personnel with whom we work to deliver services to clients
    - suppliers of goods to enable us to provide recruitment services to our clients, such as office equipment, food and drink, stationery
    - suppliers of services to enable us to provide recruitment services to our clients, such as accounting, auditing, IT, insurance, cleaning, catering, facilities management, maintenance and transport

Our policies on slavery and human trafficking

11. We have an internal Anti-Slavery and Anti-Human Trafficking Policy ("Policy") which can be accessed by contacting our HR team (hr@venngroup.com). This policy sets out our commitment to combatting modern slavery and human trafficking and covers training, processes and reporting, supplier obligations and best practice.

Training

12. We provide all employees with training on the risks posed by modern slavery and the processes and procedures designed to combat it within our organisation and within our supply chain.

13. Our training for employees who may come into direct contact with potential victims of modern slavery emphasises the need for extra vigilance when verifying documents, undertaking additional checks and keeping copies of all official documents, as well as the importance of following up and reporting any inconsistencies or suspicions to management.

Due diligence processes for slavery and human trafficking

14. As part of our zero-tolerance approach to slavery and human trafficking and as part of our initiative to identify and mitigate risk, we have specific systems and processes in place which are focussed on recognising and carefully assessing potential risk areas in our supply chain and within our organisation.

15. We have identified some goods and services supplied to us which are at a higher risk of modern slavery, particularly in our cleaning services, food purchasing arrangements and property maintenance.

16. We also recognise there is a higher risk of modern slavery in supply chains involving overseas suppliers of goods and services.

17. We understand the perpetrators of modern slavery may go to great efforts to conceal their activities and victims of modern slavery may be vulnerable and reluctant to come forward.

18. Recognising these risks allows us to target our resources effectively to combat the risk of modern slavery where it is highest.

19. As a business within the recruitment sector, we already have a number of specific processes and systems in place which are either required by law or recommended as best practice, many of which also assist in identifying and minimising the risk of modern slavery within our organisation and supply chains. These include:

- undertaking ID checks
- obtaining references
- checking right to work in the UK
- working only with suppliers approved or verified by the company

20. We continually review and modify our internal processes to ensure compliance and to minimise the risk of modern slavery taking place within our organisation and supply chains.

21. All our employees are aware of our Whistleblowing Policy which can be found in our intranet and the processes in place. Employees are encouraged to report any concerns or suspicions they have that slavery or human trafficking is taking place within our organisation or supply chain. Employees are aware they will not suffer any detriment as a result of disclosing a concern relating to slavery or human trafficking in good faith.

22. We regularly review our suppliers to ensure we are satisfied they have taken reasonable steps to minimise the risk of slavery or human trafficking taking place within their organisations or within their supply chains.

23. We have provided our internal employees with a comprehensive internal Anti-Slavery and Anti-Human Trafficking policy, which deals with training, processes and reporting, supplier obligations and best practice.

24. Any suspicions of modern slavery taking place within our business, supply chain or in the course of our day-to-day dealings with candidates will be reported promptly to the police and/or the Gangmasters and Labour Abuse Authority (GLAA).

25. Our internal policy and training have emphasised our expectation that all employees comply with all relevant processes as notified and updated from time to time.

26. All new suppliers are engaged under written terms requiring them to comply with all laws relevant to their businesses.

Further steps

27. To ensure our practices are as effective as possible, we regularly review our anti-slavery strategies.

Key performance indicators

28. We will monitor the indicators below to assess the effectiveness of the steps we take to combat modern slavery:

- completion of training
- reports of occurrence or potential occurrences of modern slavery
- review of suppliers to obtain published modern slavery statements and/or procedures in place to tackle modern slavery

29. This statement has been approved by Stan Murray-Hession, Managing Director, and constitutes our organisation's Slavery and Human Trafficking Statement pursuant to Section 54 of the Modern Slavery Act 2015, for the financial year ending 31st December 2026.

Signed for and on behalf of
Venn Group Ltd

Keith Wilmott
Chief Financial Officer

Date: 02/05/2026