

Vita Group Holdings Ltd (co. no. 11963176) and all subsidiaries (Vita Group)

Modern Slavery Policy

For the purposes of instilling a culture and values within Vita Group to combat slavery and human trafficking and for compliance with the UK's Modern Slavery Act 2015.

Ownership	Giles Beswick, Director on behalf of the Vita Group Board
Policy approved by	Governance Committee
Policy approved	24 April 2023
Review date	24 April 2026

This policy will be reviewed triennially by the Governance Committee, unless there is a change in the UK legislative framework that requires it to be updated and reviewed sooner.

Minor updates, for example name changes, will be made periodically on the authority of the Chief Executive Officer or General Counsel as required.

1. Policy Definitions

References in this policy to “we”, “us” and “our” are to the Vita Group and all its subsidiaries (the ‘Group’). References to “you” and “your” are to those responsible for complying with the policy, as set out under ‘Policy Compliance’ below.

Modern Slavery: is a term used to encapsulate offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labour; and human trafficking.

- a) **Slavery and servitude:** this is where people are dehumanised, treated as a commodity, bought or sold as “property”, have restrictions placed on their freedom or are generally exploited for someone else’s gain. Slavery often involves Forced or Compulsory Labour.
- b) **Forced or Compulsory Labour:** this is where someone is forced to work, or is otherwise controlled by an “employer”, through coercion, mental or physical abuse, or the threat of abuse.
- c) **Human trafficking:** relates to arranging or facilitating the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

2. Policy Declaration

- 2.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 2.2 We are committed to combatting slavery and human trafficking in all its forms in our own business and in our supply chains. Vita Group adopt a zero-tolerance approach to any criminal offence. Vita Group will publish a modern slavery statement every year in accordance with section 54 (6) of the UK’s Modern Slavery Act 2015.
- 2.3 We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

3. About this policy

- 3.1 This policy relates to Vita Group Holdings Limited and all wholly owned and managed UK-registered subsidiary undertakings.

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- 3.2 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. References throughout the rest of this policy to 'You' or 'Your', assumes the reader falls within one of these definitions.
- 3.3 This policy does not form part of any employee's contract of employment, and we may amend it at any time.
- 3.4 The purpose of this policy is to:
- (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
 - (b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

4. Responsibility for the Policy

- 4.1 The Vita Group Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The published Modern Slavery Statement will be approved by the Board annually.
- 4.2 One of the Company Directors, Giles Beswick has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 4.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Giles Beswick.

5. Your responsibilities and how to raise a concern.

- 5.1 You must ensure that you read, understand and comply with this policy.
- 5.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.3 You must notify your Line Manager or Giles Beswick as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.
- 5.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

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- 5.5 If you believe or suspect that a breach of this policy has occurred or that it may occur, you must notify your Line Manager or Giles Beswick as soon as possible.
 - 5.6 You may also report any such concerns in accordance with the company Whistleblowing Policy – see the Employee Handbook for a full copy.
 - 5.7 You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.
 - 5.8 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Giles Beswick or see 5.6 above.
 - 5.9 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 as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager or the Head of Human Resources immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Company's Employee Handbook.

6. Training and communication

- 6.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 6.2 Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

7. Breaches of this policy

- 7.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 7.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.