

1 GENERAL STATEMENT OF POLICY TO WORK SAFE AT ALL TIMES

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain.

At Ventilation Environmental Supplies PLC, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We endeavour to take steps where required to tackle modern slavery, as outlined in this statement.

This statement sets out the actions that we are taking to understand all potential modern slavery risks related to our business, and to assist where practicable to prevent slavery and human trafficking within our organisation.

1.1 OUR BUSINESS AND SUPPLY CHAINS

Our Company Ventilation Environmental Supplies PLC was established over thirty years ago. Its director is Mr Nigel Haywood

Our business is one of the leading independent wholesalers to the heating and ventilation industries

Our main activities are within the UK we do not travel to work outside of the UK in Europe or other countries, we source all our materials on a cost for cost basis from local supplies.

At Ventilation Environmental Supplies PLC, we establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors.

Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

[To date we have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.]

1.2 RISK ASSESSMENT.

In the past year, we conducted a risk assessment of our supply chain by considering:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers.
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

Our conclusions of these assessments allowed us to trade with our suppliers safely in the knowledge we are fully compliant with current regulations.

1.6 POLICIES

Ventilation Environmental Supplies PLC operates the following policies for identifying and preventing slavery and human trafficking in our operations:

Whistleblowing Policy - we encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.

We can provide a confidential helpline to protect the identity of the whistle-blowers.

Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business.

We strive to maintain the highest standards of employee conduct and ethical behaviour where operating and managing our supply chain.

Purchasing Codes - in the event of an unfortunate incident the company have considered Purchasing Codes and supplier contracts to make explicit reference to slavery and human trafficking.

This will only take effect as and when required.

1.7 SUPPLIER DUE DILIGENCE

Ventilation Environmental Supplies PLC conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of services
- Auditing the suppliers, and their health and safety standards, employment relations and employee contracts
- Sanctioning suppliers that fail to improve their performance in line with our requirements.

1.8 WE REQUIRE ALL SUPPLIERS TO ATTEST THAT:

They do not use any form of forced compulsory or slave labour.

Their employees work voluntarily and are entitled to leave work.

They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.

They do not require employees to post a deposit/bond and do not withhold their salaries for any reasons.

They do not require employees to surrender their passports or work permits as a condition of employment.

1.9 AWARENESS

Ventilation Environmental Supplies PLC has raised awareness of modern slavery issues by putting up posters across our facilities and sending an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

1.10 TRAINING

In addition to the awareness programme, Ventilation Environmental Supplies PLC has sourced a fresh e-learning course for employees and supplier contacts, the contents are as follows:

- Various forms of modern slavery in which people can be held and exploited.
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery?
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls?
- What steps ABC plc will take if a supplier fails to implement anti-slavery policies or controls?
- An attestation from employees that they will abide by ABC plc's anti-slavery policy.

1.11 MEASURING HOW WE'RE PERFORMING

Ventilation Environmental Supplies PLC has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- ✓ How many employees have completed mandatory training?
- ✓ How many suppliers have filled out our ethics questionnaire?
- ✓ How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- ✓ How many reports have been made by our employees that indicate their awareness of and sensitivity?

This statement covers 1st April 2025 and will be reviewed annually by the company and has been approved by the Director at Ventilation Environmental Supplies PLC

Signed

Date

Director : Nigel Haywood

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