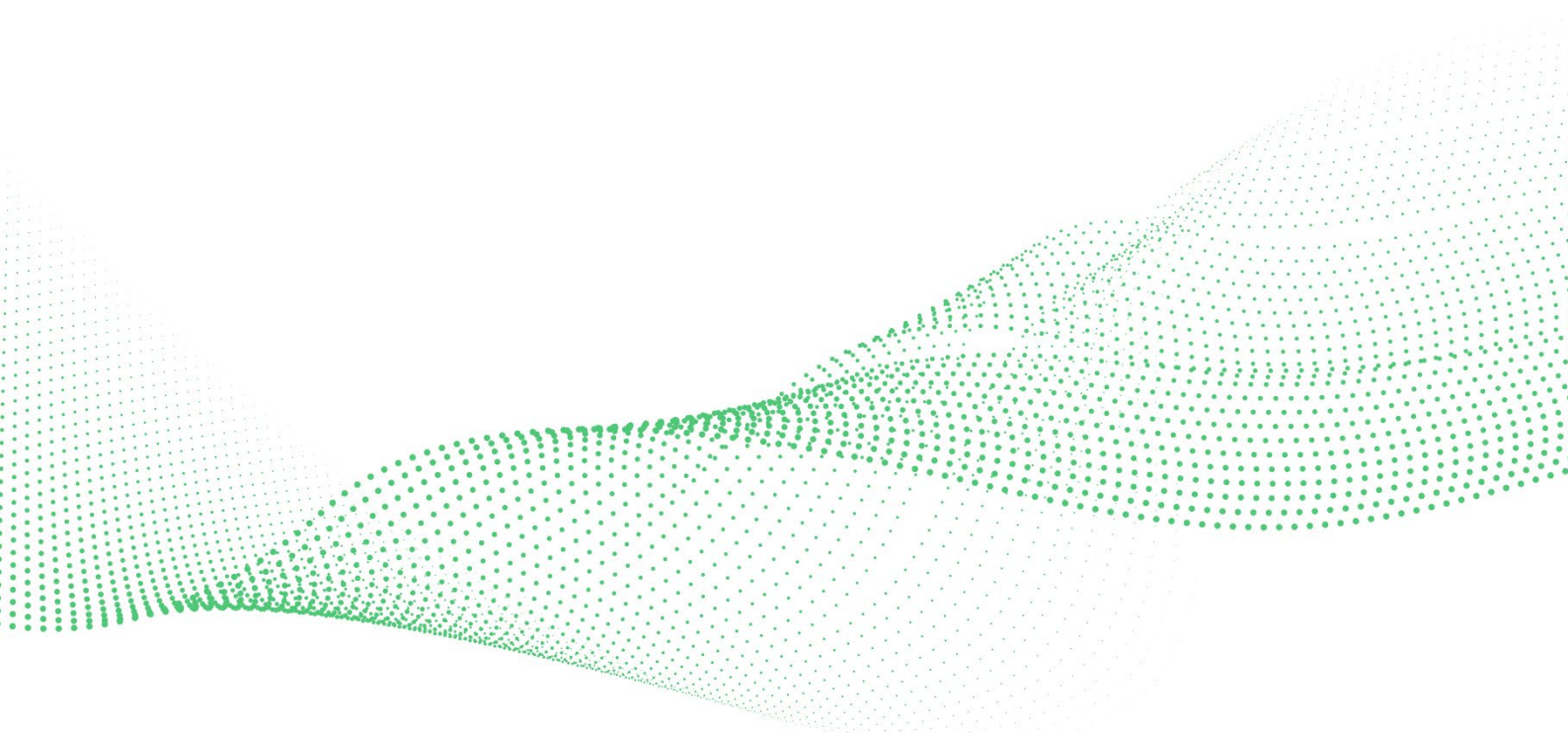


VCG

BP035 Modern Slavery Policy and Statement

V2.1



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1. Modern Slavery Statement 2025/2026

Modern Slavery is a serious and cruel crime that sees exploitation of human beings around the world for financial and criminal gain.

There is no typical victim of modern slavery, and we recognise that acts of slavery could come from people exploited for work, labour, criminality, or domestic servitude. It is therefore imperative that we maintain our ethical and legal duties to prevent any form of human exploitation through the processes defined in this policy.

VCG has committed itself to ensure itself and its supply chains are thoroughly scrutinised to ensure that neither it nor its partners profit from the inhuman exploitation of others.

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 implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. 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 and we expect that our suppliers will hold their own suppliers to the same high standards.

This modern slavery 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, agents, contractors, external consultants, third-party representatives, and business partners. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Tom Kelly

VCG Technology Chairman

2. Purpose

As a Managed Services Provider, VCG Technology Services LTD recognises the responsibility we have to uphold ethical standards across our operations, services, and supply chains. We are committed to preventing modern slavery, human trafficking, forced labour, and exploitation in all forms, and to promoting transparency and accountability throughout our business activities.

3. Our Commitment

We are fully committed to complying with the Modern Slavery Act 2015 and ensuring that slavery and human trafficking do not occur within our organisation or in any part of our supply chain. This policy outlines our commitment and the steps we take to prevent and address such risks.

4. Scope

This policy applies to:

- All employees, directors, and officers of VCG Technology Services LTD
- Contractors, consultants, agency workers, and temporary staff.
- Suppliers, partners, and third-party service providers, especially those who support our service delivery (e.g., IT support, data centres, network services, and equipment vendors).

5. Policy

5.1 Our Operations and Supply Chain

We provide managed IT and telecom services, often relying on a mix of in-house capabilities and third-party suppliers. As part of our due diligence, we:

- Assess our suppliers' compliance with ethical and legal standards.
- Prioritise working with suppliers who demonstrate a strong commitment to fair labour practices.
- Require supplier adherence to our Supplier Code of Conduct, which explicitly prohibits forced labour, slavery, or human trafficking.

5.2 Risk Assessment and Mitigation

We regularly evaluate:

- Geographic and industry-specific risks in our supply chain.
- Labour practices in sectors supplying IT hardware, cloud services, or offshored customer support.
- New suppliers' compliance before onboarding and during the contract lifecycle.

Where higher risk is identified, we may seek further documentation, certifications, or conduct audits.

5.3 Training and Awareness

To support our commitment:

- We provide training to relevant staff on identifying signs of modern slavery and escalation routes.
- Procurement and contract managers receive enhanced guidance to assess risk and engage with suppliers responsibly.

5.4 Reporting Concerns

We encourage employees, partners, and third parties to report concerns about potential modern slavery or unethical practices. Reports can be made confidentially via:

- Email: compliance@vcg.group
- Whistleblowing hotline or Via the HR team/ESG Director

All concerns will be taken seriously and investigated appropriately. We will ensure no retaliation occurs for whistleblowing in good faith.

5.5 Roles and Responsibilities

The 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 Director of ESG 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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

6. Document Revision

Revision	Date	Author	Description
1.0	23/04/2022	Stuart Thomas	2022/2023 document initially drafted.
1.1	25/04/2023	Hollie Dixon	Updated CEO
1.2	19/02/2024	Craig Steele	Document owner changed from Compliance Manager to Executive Assistant
2.0	25/03/2025	Hollie Dixon	Annual Review Changes to Layout of the policy minimised content to advise on • Supply Chain & Operations • Risk & Mitigation • Training & Awareness • Reporting • Roles & Responsibilities
2.1	23/03/2026	Hollie Dixon	Annual Policy Review

7. Authorisation

The ESG Director is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the business policy management requirements. A current version of this document is available to all members of staff on Sharepoint. This policy was approved and is issued on a version-controlled basis under the signature of the Chief Executive Officer

Title	Name	Signature	Date
Chief Executive Officer	Rob Moss		23/03/2026