



VIVO



Modern Slavery Statement 2022

VIVO Defence Services Ltd

Our Commitment

The Modern Slavery Act 2015 (“the Act”) requires certain businesses to set out the steps they have taken to ensure slavery is not taking place in their operations and supply chain. VIVO are fully committed to playing our part in eradicating modern slavery.

Jerry Moloney
Managing Director
VIVO Defence Services



What is Modern Slavery?

Modern slavery is an international crime that affects an estimated 40 million people around the world. It includes victims trafficked from overseas and vulnerable people in the UK who are forced to work against their will or are exploited. This disturbing issue transcends age, gender and ethnicity.

About VIVO

VIVO is the largest provider of repair and maintenance services to military estates and housing in the UK. We are solely dedicated to the Ministry of Defence and its partners, and we're proud of the role we play in the defence of the UK and our NATO allies

We are a relatively new organisation, but formed by our two shareholders in a 50/50 joint venture to bring together their complementary strengths to create a critical partner for the MoD:

- **Equans** is a global leader in facilities management and housing maintenance, and energy efficiency
- **Serco** is a global leader in business services with a proud history of working with the UK and US military, and the wider UK and international public sectors

Using the experience, capabilities and reputations of our shareholders has enabled VIVO to bid for and win the largest share of estate and housing maintenance in the UK from a standard start in 2020.

£350m

Turnover in 2022 (circa.)

1000

Employees (circa.)

1000

Suppliers/Subcontractors (circa.)

Our Approach

Our Risk Assessment

We have assessed our business for the potential for the risk of modern slavery and concluded that the two main areas where modern slavery could, theoretically, occur is within our own workforce and in the workforce of our supply chain.

Our Workforce

We consider that we have adopted robust employment practices for recruitment and management of our own staff and we manage any temporary workers engaged by us through a specialist provider in respect of which we have undertaken due diligence as described below in more detail. Accordingly, we believe that the risk of modern slavery is more likely within our supply chain than within our own workforce

Our Supply Chain

Our supply chain involves more than 1000 suppliers and subcontractors, the majority of which is based in the UK. In line with the diverse nature of our business endeavours, the competencies of our supply chain and the industries in which they operate vary greatly. For example, our supply chain and subcontractors provide equipment installation and maintenance, construction work (including civils, plumbing, electrical, bricklaying, carpentry etc.), grounds maintenance services, IT software, the supply of general building materials and plant hire.

We assess risk in our supply chain based on physical, business and volume related risks. On that basis, we review our supply chain to identify areas where potential modern slavery risks may arise.

Having assessed our supply chain for the potential for the risk of modern slavery, we have identified a number of categories of services provided to us by our supply chain where we consider that there is a higher risk of modern slavery or human trafficking occurring. We have focussed our attention on these areas which are:

- Construction workers (low and unskilled)
 - Contingency & agency workers
 - Waste Management
 - Pest Control
 - Grounds Maintenance
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Our Policies & Practices in Relation to Modern Slavery **VIVO**

Our Code of Conduct sets out expected behaviours in relation to ethical requirements for all employees. The Code requires every employee to take seriously their role in building and protecting our reputation, by acting in full compliance with the applicable laws and our values and ethical principles, in all our activities.

In February 2022, we published a Modern Slavery Procedure which sets out our commitment in relation to eradicating modern slavery. Within the procedure we have specifically outlined the roles which we expect our staff and leadership team to take in supporting this commitment to eradicate modern slavery in all of its forms.

Alongside the Code of Conduct and Modern Slavery Procedure, we have in place a set of policies, processes and procedures which seek to ensure that slavery and human trafficking is not taking place in our supply chain or our operations.

We assess instances of non-compliance, of which we become aware, taking appropriate remedial action as expeditiously as possible.

These include:

- VIVO's Purchasing Policy.
- Our Responsible Procurement Policy and Supplier Charter. These documents outline our expectations of our supply chain and our approach to a range of issues including modern slavery and ethical conduct of our supply chain.
- Adoption of the Prompt Payment code.
- Our Supplier Code of Conduct which sets out the principles we follow when dealing with suppliers.
- Undertaking due diligence on our supply chain as described below.
- Entering into contractual commitments with our supply chain as described below.
- Providing our suppliers with access to a specific ethics incident reporting (whistleblowing) hotline.
- Establishing a supplier portal to enable our supply chain to access online training.

We are committed to ceasing trading with suppliers showing persistent disregard for important elements of environmental, social and ethical performance.

Our Due Diligence process

In our own operations

We have developed an internal Ethics reporting system. This reporting system provides a place where acts of potential unethical or non-compliant behaviour, which would include modern slavery or human trafficking, can be reported for escalation. This reporting system comprises a clear mechanism for reporting of any issues and the reporter may remain anonymous if they so wish. Any matters raised are assessed through a formal investigation procedure and considered by the senior management team within VIVO.

Our people are subject to various appropriate pre-screening checks during recruitment. This includes right to work checks pre-employment and throughout employment for those individuals whose right to work is not permanent.

We ensure that the majority of temporary labour (other than some office-based workers) is sourced through our Managed Service Provision List. This enables us to engage workers through verified suppliers of temporary labour and our contracts with these suppliers require them to adhere to the highest ethical standards.

We require these suppliers to produce an annual slavery and human trafficking report, which sets out the measures they have taken to ensure that slavery and human trafficking is not taking place within their business or supply chains.

Our contractual relationship with these suppliers of temporary labour also requires them to undertake robust onboarding checks before an individual will be engaged.

In addition to workers engaged through our Managed Service Provision List, on occasion we may source temporary office-based workers through other specialist suppliers. Our risk assessment has determined that these workers present a lower risk of modern slavery and so, whilst these workers will only be sourced through agencies who have agreed to our preferred supplier contractual terms, there is no requirement for those suppliers to undertake a bi-annual audit on those workers.



Our Due Diligence process

In our supply chain

Prior to their engagement, we require all suppliers to complete our internal supplier questionnaire and gain an approved verification from our vendor assessment partner, Constructionline. This requires the supplier to provide information regarding the risk assessment and due diligence measures they have implemented to mitigate the risk from modern slavery within their organisation and supply chain. Responses to the supplier questionnaire are subject to a desktop audit which is conducted jointly by staff from our Procurement, Health, Safety and Environment teams. During the onboarding process, these suppliers are required to confirm that they can, and will, adhere to the commitments presented within our Supplier Code of Practice. These commitments ensure that our suppliers support us in achieving our ethical ambitions, which includes adherence to the highest standards in the fields of ethics (including modern slavery), health and safety and the environment.

We have undertaken due diligence investigations on our high-risk category groups and, during 2023, enhanced due diligence will be undertaken on all suppliers within this group.

In addition to the above due diligence measures, there are in excess of 800 suppliers on our preferred supplier list for FM services who are subject to annual desktop audits, which are conducted by our buying support team.

Suppliers are required to implement due diligence on their own suppliers and subcontractors to ensure that slavery or human trafficking does not exist in their supply chain. Suppliers are also required to notify us if they discover any actual or suspected slavery or human trafficking within their supply chain.



Training our employees and providers

Suppliers

We have published online training modules which are available for all suppliers via our supplier portal.



Employees

Our staff are all required to undertake mandatory ethics training, which includes bespoke modules entitled "Ethics in the Workplace" and "Code of Conduct". Additionally, we have our Modern Slavery Act awareness training which ensures that our staff are appropriately trained to identify the signs of modern slavery and know how to report any concerns in a timely and effective manner.

All employees are bound, by virtue of their terms of employment, by our policies, procedures and Code of Conduct.



Measurement of our progress

We have developed a set of key performance indicators (KPIs) to report our performance which includes:

- ✓ completion of modern slavery training by employees;
- ✓ undertaking due diligence investigations on our suppliers;
- ✓ conducting desk-top audits on suppliers on our preferred supplier list; and
- ✓ monitoring suppliers' applications of policy and audit regime.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for VIVO Defence Services Limited for the financial year ending 30 September 2022.



Jerry Moloney, Managing Director
VIVO Defence Services, 31st March 2023

Our Future Plan

In 2023 we will require suppliers and subcontractors to complete a specific supplier questionnaire, to enable us to manage more effectively the risk of modern slavery from the procurement of higher risk services.

We will also look to enhance our e-training offering and extend to the supply chain, encouraging uptake and hosting a number of regional supplier days to work with our supply chain to raise awareness and promote best practice.

VIVO