

# Slavery and Human Trafficking Statement

Vision Support Services Ltd

## Introduction

This statement sets out Vision Support Services Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring, where reasonably practicable, that no slavery or human trafficking occurs within its own business and its supply chains. This statement relates to actions and activities during the financial year 1<sup>st</sup> April 2016 to 31 April 2017 and is an initial statement that will establish our future direction.

As part of our global supply chain, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Vision Support Services Ltd is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain, and our products.

We realise that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse. Therefore throughout this statement, we, Vision Support Services Ltd. use the terms 'slavery and human trafficking to encompass all these various forms of coerced labour.

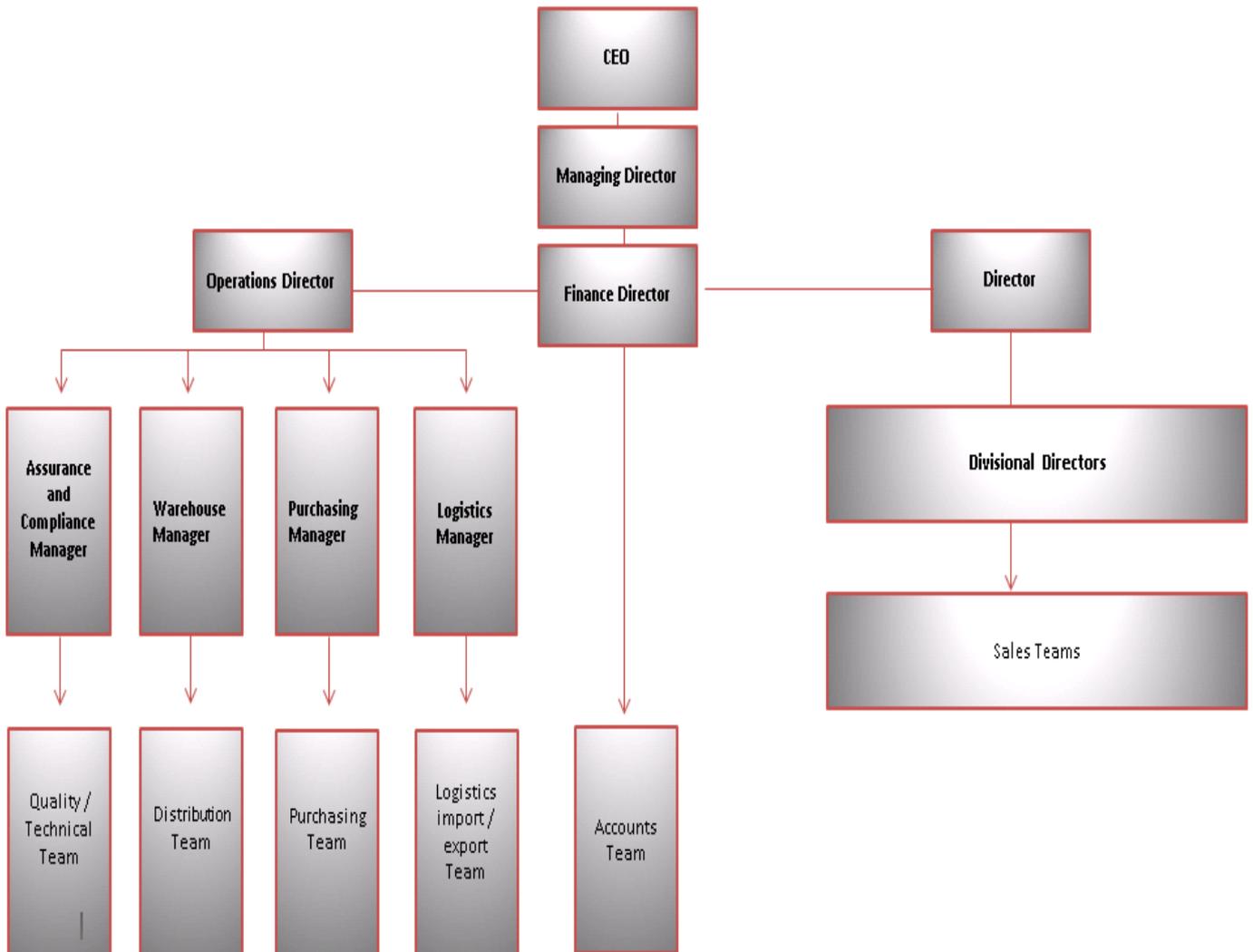
As outlined in greater detail below, we take certain steps during the financial year, to ensure that slavery and human trafficking are not taking place in our supply chains or other parts of our business. We acknowledge that this is a work in progress and aim to review all aspects of our supply chain within the next five years.

To this end, we have established an integrated approach to managing human rights across our business, including risks related to slavery and trafficking.

This statement covers the activities of Vision Support Services Ltd:

Vision Support Services Ltd. is the leading supplier and distributor of luxury, performance and specialist textiles in the global accommodation, retail and healthcare markets

## Our Organisational Chart



## Countries of operation and supply

The organisation currently operates in the following countries:

United Kingdom

Ireland

India

Pakistan

China

Turkey

Dubai

We assess whether or not particular activities or countries are a higher risk in relation to slavery or human trafficking by undertaking a stringent risk assessment process in relation to our operations inside and outside the UK.

Firstly, by an initial written questionnaire to be completed by all of our key suppliers, ensuring that they, have strong anti-slavery or human trafficking policies in place, and these policies are enforced, and also that they, the supplier (and their manufacturing/supply chains) are also fully compliant with the Modern Slavery Act of 2015.

Secondly by having our own premises and representatives in each country of supply which allows us to carry out spot checks on site and have ready access to “on the ground” information which can be obtained to oversee this process.

Thirdly by independent audit of our suppliers through accredited third party audits (BSCI/SMETA).

## High-risk activities

The following activities are considered to be at a higher risk of slavery or human trafficking:

The manufacture and production processes for our product lines is not UK based therefore any workforce involved in this manufacturing process could potentially be exploited/ be at high risk in relation to slavery or human trafficking, thus failing to meet one or more areas of policy and so not being compliant with the Modern Slavery Act of 2015. Our Labour Standards Assurance System and presence in manufacturing countries are used to mitigate this risk.

## Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- Our Assurance and Compliance Manager is responsible for putting in place any anti-slavery initiatives / human trafficking policies. They also hold the responsibility for the regular review of these policies and the processes by which they were developed/ are being developed to be within guidelines.
- Our Assurance and Compliance Manager has broad organisational responsibility for human rights and modern slavery risk analysis, looking at processes/ ongoing reviews/ regular actions in this area to ensure Vision Support Services Ltd. are compliant, meeting the requirements of the act.

- The Operations Director has responsibility to ensure we meet our anti-slavery or human trafficking policies and responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. This is achieved by the undertaking of reviews of the supplier's statements of compliance. Steps are taken to verify, evaluate and address risks of slavery of any form in the supply chain.

## Training

Vision Support Services Ltd has provided training to key staff with responsibility for compliance to the Act.

## Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy**

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report it in a number of ways either by using the Modern Slavery Website <https://modernslavery.co.uk/report-it.html> or by calling on 0800 0121 700 or by completing following our Whistleblowing Policy.

- **Employee code of conduct**

The organisation's code is outlined in the Corporate and Social Responsibility Policy and our employee's handbook makes clear to all employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour at all times

- **Supplier/Procurement code of conduct**

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their employees' working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. We require all chains of supply/procurement routes to complete a statement of compliance in relation to the Modern Slavery Act 2015.

- **Recruitment policy**

The organisation uses only specified, reputable employment agencies to source our labour and always verifies the practices of any new agency we may wish to work with before accepting any workers or placing recruitment requirements for employees from that agency.

- **Any other policies relevant to the organisation's business or sector**

Our organisation has a policy, as outlined in our employee's handbook, that remuneration is above the minimum wage level. We ensure all employees have the right to work in the United Kingdom.

As part of our labour standards assessment we also look to ensure that our suppliers are paying their workers above the local average wage.

## **Due diligence**

The organisation undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier - we undertake a full review of all new suppliers, requiring their written statement of compliance to the Modern Slavery Act of 2015, giving 30 days maximum notice to provide a statement of compliance.
- Seeking demonstration of effective modern slavery and human trafficking policies and practices to be in place before beginning trading.
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- Conducting supplier audits and assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified.

## **Performance indicators**

The organisation has reviewed its key performance indicators (KPI's) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- Requiring designated staff to have completed training on modern slavery by August 2017;
- Reviewing the system for supply chain verification
- Reviewing our existing supply chains - expected to be completed by January 2018.

## **Awareness-raising programme**

It is our intention during the next financial year to raise awareness of modern slavery issues by putting up posters across the organisation's premises and using the monthly staff newsletter to ensure that this issue remains prominent.

**We intend to explain to staff:**

- The basic principles of the Modern Slavery Act 2015
- How employers can identify and prevent slavery and human trafficking
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation
- What external help is available, for example through the Modern Slavery Helpline

**Board approval**

This statement has been approved by the organisation's board of directors, who will review and update it annually.

**Signature**

**Director**

**Date:**