

Issue 01

Date: March 2017

Approved: P Lawson



Modern Slavery and Human Trafficking Policy

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the Company's financial year.

The statement sets down Virtue Technologies's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Virtue Technologies Ltd which are as follows:

Virtue Technologies Ltd is a Company registered under number 05672642 whose registered address is Chadwick House Maple View Skelmersdale Lancashire WN8 9TD .

The Company offers IT solutions mainly in the education sector. The business structure is a traditional one and the supply chain is limited to the UK and the EU.

The Company currently operates in the following countries:

UK only.

High Risk Activities

Given the Company structure, the current supply chain and the markets in which it operates, no activities are considered to be at high risk of modern slavery or human trafficking:

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

- 1.1 Policies: Phil Lawson is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting the needs of the Company.
- 1.2 Risk assessments: Phil Lawson is responsible for risk assessments in respect of human rights and modern by a process of reviewing the business planning process, assessing supply chains and the markets in which it operates.
- 1.3 Due diligence: Phil Lawson is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

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Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires any Company training plan to take into account the requirements of the Modern Slavery Act. .

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships and making clear our expectations of business partners **AND/OR** evaluating the modern slavery and human trafficking risks of each new supplier **AND/OR** invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. Phil Lawson endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorized by:

Name: Phil Lawson

Position: Managing Director

Date: 30th April 2018

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