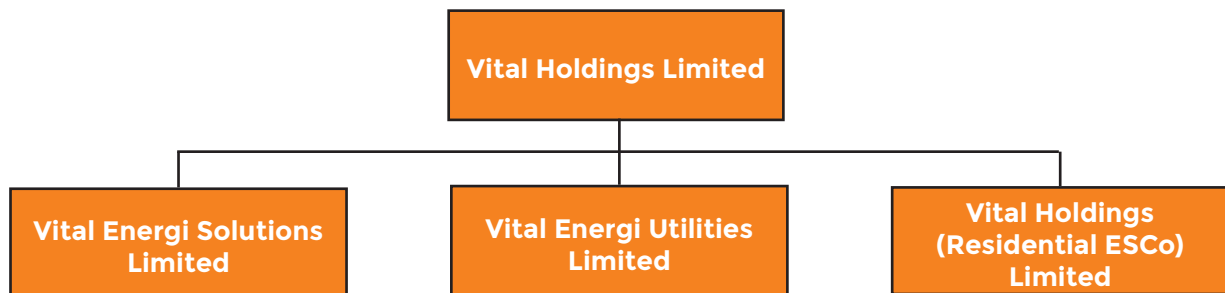




VITAL HOLDINGS LIMITED ANNUAL MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2019

COMPANY STRUCTURE

A subsidiary business of Vital Holdings Limited; UK based and operating in the construction field across a large variety of sectors including healthcare, education, industrial, residential, justice and defense, Vital Energi Utilities Limited together with its sister businesses Vital Energi Solutions Limited and Vital Holdings (Residential ESCo) Limited provide and maintain on customers behalf, community energy generation and distribution solutions for public and private sector projects.



With a workforce of 443 direct employees and an average 250 supply chain employees Vital Energi's values demand integrity, respect, teamwork and excellence. All direct employees and supply chain partners are paid by bank transfer and we do not allow payments to be made into third party bank accounts.

CURRENT APPLICATION OF STANDARDS

Having developed a Policy in 2017 Vital Holdings Limited and its subsidiary's acknowledge the duties and responsibilities required under the Modern Slavery Act 2015 and are committed to conducting all aspects of our business in an ethical and transparent manner.

In common with other companies operating in the construction industry, the business model of subsidiaries in Vital Holdings Limited means that we work in partnership with a large number of sub-contractors and other suppliers to fulfil our commercial and contractual obligations to our customers. There are often a number of tiers of suppliers between Vital Holdings subsidiary companies (who often act as the Principal Contractor) and the labour and source of the materials used on our projects.

Applying a risk management approach, we are conscious therefore that the risk of modern slavery and human trafficking can occur within our operations, whether through direct employment, sub-contracted employees or the supply of materials. Accordingly, we manage both internal recruitment (through HR Policies) and supply chain management (through contractual order requirements) to mitigate the risk of modern slavery.

Interaction with suppliers tends to be controlled through Vital Energi Utilities Limited on behalf of all the businesses within Vital Holdings Limited. This is managed via our Human Resource, Commercial and Procurement teams. Our suppliers and associating contractors remain predominantly UK based, save for the supply of some key materials which are sourced from EU countries such as Poland, Denmark and Germany.

We are aware that the biggest slavery and human trafficking risks for Vital Energi lie in our supply chains, With the rise in the number of non UK nationals present within the UK labour market we seek to understand where in our supply chain(first tier and below) incorporate the use of temporary workers, through the use of employment agencies, is taking place and through induction and other processes we seek confirmation of individuals right to work in the UK.

Our whistleblowing policy includes and encourages employee to report wrongdoing in any form including bullying and exploitation.

ACTIONS COMPLETE DURING CURRENT FINANCIAL YEAR

During our operating Financial Year of July 2018- June 2019 we have:

- Reviewed and updated Modern Slavery & Human Trafficking Policy Statement.
- Reviewed with HR and Commercial Dept. supporting policy requirements relating to Modern Slavery & Human Trafficking Policy.

PROPOSED ACTIONS

- Introduce additional vetting process specific to Modern Slavery & Human Trafficking into our sub-contractor and supply chain pre-qualification processes; implementing the guidance advocated in the “Transparency In Supply Chains” practical Guide under Section 54(9) of the Modern Slavery Act 2015.
- Implement increased training on Modern Slavery & Human Trafficking at induction and as part of the business wide mandatory e-learning training programmes. Raising awareness both in-house and within our approved sub-contractors.
- Implement as part of the company quality audit programme, additional monitoring and evaluation measures relating to the application of control mechanisms and suitability of stakeholder engagement.
- Develop links with external (independent) authorities such as the Gangmasters & Labour Abuse Authority with a view to becoming a member and advocate of their Construction Protocol.
- Continue to review and evolve our anti-slavery and human trafficking policies and procedures.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Vital Energi’s modern slavery and human trafficking statement for the financial year ending 31 July 2019.



Gary Fielding
Joint Managing Director
Date: May 2019



Ian Whitelock
Joint Managing Director
Date: May 2019