

# Anti-Slavery and Human Trafficking Policy

## Policy Statement

This policy applies to all persons working for Validus-IVC Ltd or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, agents, contractors and suppliers.

Validus-IVC Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are and will continue to be committed to implementing controls and systems aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains, and we expect that our suppliers will hold their own suppliers to the same high standards.

## Our Commitments

### *Modern Slavery and Human Trafficking*

'Modern slavery' is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

### *Validus Commitments*

We are a company that expects everyone working with us or on our behalf to support and uphold the following standards to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The company has allocated the responsibility for assessing and managing slavery and human trafficking risks to the General Manager as a member of the company's Executive Board.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our contracting processes and keep them under review. We assess whether the particular circumstances of the supply warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with that supplier. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with these standards of conduct, which are the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk based approach we may require:

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- (a) employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our standards of conduct;
  - (b) suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to these standards.
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our standards of conduct.
  - If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

The General Manager

## Document Control

### Accountability

<b>Document Owner</b>	General Manager (NF)
<b>Document Author</b>	General Manager (NF)

### Authorisation

<b>Committee</b>	Executive Team
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### Administration

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