

Modern Slavery and Human Trafficking Policy

PURPOSE

This policy outlines Vergo Pest Management Ltd.'s commitment to identifying, preventing, and addressing modern slavery and human trafficking within our operations and supply chains. We maintain a zero-tolerance approach to any form of slavery, servitude, forced or compulsory labour, or human trafficking.

SCOPE

This policy applies to all persons working for or on behalf of Vergo Pest Management Ltd, in any capacity, including employees, agency workers, contractors, suppliers, consultants, and third-party representatives.

DEFINITION OF MODERN SLAVERY AND HUMAN TRAFFICKING

We define modern slavery as when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom.

Human trafficking is a form of modern slavery and involves the use of violence, threats, or coercion to transport, recruit, or harbour people to exploit them for purposes such as forced prostitution, labour, criminality, marriage, or organ removal.

There are many forms of Modern Slavery, including forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold, or treated as a commodity, and having restrictions on freedom of movement.

LEGAL FRAMEWORK

This policy supports compliance with the Modern Slavery Act 2015 and aligns with the International Labour Organization (ILO) Standards and UN Guiding Principles on Business and Human Rights.

Vergo Pest Management Ltd will publish an annual Modern Slavery and Human Trafficking Statement in accordance with Section 54 of the Modern Slavery Act. The statement will be approved by the Board, signed by the Chief Executive Officer, and published on the company website each financial year.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Vergo Pest Management Ltd operates nationally across the UK, providing pest, wildlife and facilities management services. Our recruitment, onboarding, and employment practices are designed to ensure that all prospective employees are legally entitled to work in the UK and we don't currently use employment agencies to provide workers. We consider our internal operations to be low risk but recognise potential risks within our wider supply chain.

We expect all suppliers and contractors to uphold the same ethical standards and to cascade these expectations through their own supply chains. Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them. We do not onboard, enter into business with, or continue working with any organisation, which knowingly supports, or is found to be involved in slavery, servitude, or forced or compulsory labour. We expect all suppliers to hold these high standards and will audit any supplier deemed to be a higher risk.

POLICIES SUPPORTING THIS COMMITMENT

This policy should be read alongside the following:

- People Policy
- Whistleblowing Policy
- Diversity, Equality and Inclusion Policy
- Anti-Harassment and Anti-Bullying Policy

All are available on PeopleHR and SharePoint.

GOVERNANCE AND RESPONSIBILITIES

Ultimate responsibility for preventing modern slavery rests with the Board of Directors, who oversee implementation and review company policies and practices. The Managing Director provides strategic leadership, while the Chief Commercial Officer, Chief Information Officer, Chief Financial Officer and Head of QHSE manage investigations and due diligence.

Managers are responsible for ensuring staff understand and comply with this policy.

Employees must remain alert to indicators of modern slavery and report concerns immediately.

HR ensures related employment policies and training remain effective and compliant.

DUE DILIGENCE

We conduct due diligence on all suppliers as part of our procurement process. This includes assessing risk factors such as geography, industry sector, and labour practices. High-risk suppliers are required to demonstrate robust anti-slavery measures and may be subject to audit.

We require all suppliers to:

- Confirm compliance with the Modern Slavery Act 2015;
- Implement their own anti-slavery policies;
- Conduct due diligence on their own supply chains;
- Provide evidence of compliance when requested.

RISK ASSESSMENT AND MANAGEMENT

We assess modern slavery risks annually and whenever new suppliers or operational changes occur. Where risks are identified, we work collaboratively with suppliers to mitigate and resolve issues. Failure to remediate may result in termination of the business relationship.

REPORTING AND WHISTLEBLOWING

Concerns about possible modern slavery practices should be raised promptly. Employees can report concerns to their line manager, the Compliance Director, or confidentially via the Whistleblowing Policy. All reports will be treated sensitively and investigated promptly.

TRAINING AND AWARENESS

All new employees complete mandatory induction training on modern slavery awareness. Staff involved in recruitment, procurement, and supplier management receive enhanced, role-specific training. Refresher training is provided every two years to ensure ongoing awareness.

KEY PERFORMANCE INDICATORS (KPIs)

Where relevant, contracts will include measurable KPIs such as supplier audits, completion of training, and timely risk remediation. These will be reviewed annually.

MONITORING AND REVIEW

This policy is reviewed annually by the **Compliance Director** and approved by the **Board of Directors** to ensure it remains compliant with legal requirements and best practice. Updates will be communicated to all staff and business partners.

BREACH OF POLICY

Any employee found to be in breach of this policy will face disciplinary action, up to and including dismissal. Vergo Pest Management Ltd may terminate contracts with suppliers, contractors, or partners who breach or fail to uphold this policy.