

Annual Slavery and Human Trafficking Report

May 2022

This document is Vaculug's Annual Slavery and Human Trafficking Report as required by Joint Schedule 5 of our agreement and sets out the steps we have taken to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business.

Modern Slavery, Child Labour and Inhumane Treatment

- Vaculug does not use, nor allow its Subcontractors to use forced, bonded or involuntary prison labour;
- Vaculug does not require any supplier staff or subcontractor staff to lodge deposits or identify papers with the employer and shall be free to leave their employer after reasonable notice;
- Vaculug has not been convicted of any slavery or human trafficking offences anywhere around the world.
- Vaculug is not currently under investigation, inquiry or enforcement proceedings in relation to any allegation of slavery or human trafficking offenses anywhere around the world.
- Vaculug has undertaken measures to ensure that our officers, employees and subcontractors have not been convicted of slavery or human trafficking offenses anywhere around the world.
- Vaculug maintain throughout the term of each contract policies and procedures to ensure our compliance with the Modern Slavery Act and we include in our contracts with subcontractors anti-slavery and human trafficking provisions;
- Vaculug has implemented due diligence procedures to ensure that there is no slavery or human trafficking in any part of our supply chain performing obligations under a contract;
- Vaculug does not use, nor allow its employees or subcontractors to use physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation of its employees or subcontractors;
- Vaculug does not use or allow child or slave labour to be used by its subcontractors;
- In line with our procedures we will immediately report the discovery or suspicion of any slavery or trafficking by it or its subcontractors to CCS, the Buyer and Modern Slavery Helpline.

I confirm my company is not in scope of Section 54 of the Modern Slavery Act (2015).



Jorge Crespo
Managing Director