

## Modern Day Slavery Policy

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### Document Version Control

| Version | Date       | Description  | Change Made By                                 | Approved By                       |
|---------|------------|--|--|-----------------------------------|
| 7.1     | 29/11/2024 | Rebranding and rewrite of the businesses Modern Slavery Policy version 7.                    | Jon Burke, Group Marketing & Sales Director    | Matthew Taylor<br>CEO 02/12/2024  |
| 7.2     | 19/12/2024 | Added Prevention of Physical and Sexual Violence to be in line with the government registry. | Anthony Barnes,<br>Risk and Compliance Officer | Mark Daley Director<br>20/12/2024 |

## 1. Introduction

This policy applies to Valorem Group, which comprises of Dals Ltd, Miton Systems Ltd, Sign Solutions Ltd, Valorem Statio SRL & Translit known here within as the organisation.

Where a policy is specific to one or more members of the Valorem Group, but does not apply to all, this will be clearly specified.

The organisation committed to ensuring that our operations and supply chains are free from modern slavery and human trafficking, in compliance with the Modern Slavery Act 2015. This statement outlines the steps we have taken to identify and mitigate the risks of modern slavery in our business and supply chains, covering the financial year ending July 2025.

## 2. Scope

We are committed to the principles of the Modern Slavery Act 2015 and to the abolition of modern slavery and human trafficking across all are operations in the UK and Europe. We strive to create a safe and respectful working environment for all our employees and ensure that our suppliers adhere to the same high standards.

### 3. Organisation Structure and Supply Chains

Dals are a provider of interpreting and translation services, face to face, over the telephone and by video, to the public and private sectors and are a part of the Valorem Group and have 214 employees operating in the UK. Our total number of employees across the group is 330, including staff in Ireland and Romania.

We have an extensive supply chain network of interpreters, primarily in the UK but also across Europe. We are committed to working with suppliers – individuals and companies – who share our values and adhere to our ethical standards. We conduct regular risk assessments and audits to ensure compliance with our anti-slavery policies.

### 4. Policies About Slavery and Human Trafficking

We have implemented robust policies and procedures to prevent modern slavery in our operations and supply chains. These include:

- 1) **Code of Conduct:** Our code of conduct outlines our commitment to ethical business practices and the prevention of modern slavery.
- 2) **Supplier Code of Conduct:** We require our suppliers to comply with our standards and to ensure that there is no modern slavery or human trafficking in their own operations.
- 3) **Whistleblowing Policy:** Provides a mechanism for employees and suppliers to report any concerns about modern slavery or unethical practices confidentially.
- 4) **Prevention of Physical and Sexual Violence:** We are committed to ensuring that all individuals within our operations and supply chains are protected from any form of physical and sexual violence. Our policies and procedures are designed to prevent such incidents, and we provide clear reporting mechanisms for victims to seek help and support.

### 5. The Processes of Due Diligence

Our suppliers deliver the interpreting, some through third party companies. We conduct thorough due diligence on all our suppliers to ensure they comply with our ethical standards. This includes:

- 1) **Supplier Assessments:** We assess potential and existing suppliers based on their risk of modern slavery and human trafficking, including site visits and interviews.
- 2) **Contractual Obligations:** We include clauses in our contracts with suppliers to ensure compliance with our anti-slavery policies and require regular compliance reports.
- 3) **Ongoing Monitoring:** We continuously monitor our suppliers through audits and feedback mechanisms to ensure ongoing compliance.

## 6. Risk Assessment and Management

We regularly assess the risk of modern slavery in our operations and supply chains. Our risk assessment process includes:

- 1) **Identifying High-Risk Areas:** We identify areas within our business and supply chains that are at higher risk of modern slavery, using tools such as the Modern Slavery Assessment Tool (MSAT).
- 2) **Supplier Audits:** We conduct regular audits of our suppliers to ensure compliance with our ethical standards.
- 3) **Performance Indicators:** We use performance indicators to measure the effectiveness of our efforts to prevent modern slavery, such as the number of audits conducted, training completion rates and reported incidents.

## 7. Key Performance Indicators

We use the following key performance indicators to measure the effectiveness of our steps to prevent modern slavery:

- 1) **Number of Supplier Audits:** The number of audits conducted and the results of these audits.
- 2) **Training Completion Rates:** The percentage of employees and suppliers who have completed our modern slavery training.
- 3) **Reported Incidents:** The number of reported incidents of modern slavery and the actions taken in response.
- 4) **Financial verification:** Ensuring robust checks and controls of payment and financial data for our supply chain including any changes.
- 5) **Corrective Actions:** The number of corrective actions taken as a result of audits and their outcomes.

## 8. Slavery and Trafficking Training

We provide training to our employees on the Modern Slavery Act 2015 and the steps they can take to prevent modern slavery. This training is mandatory for all employees and is updated regularly to reflect any changes in legislation or best practices. The training covers identifying signs of modern slavery, reporting mechanisms and our company policies to ensure ongoing awareness and compliance.

## 9. Conclusion

We confirm that we have examined our own business and, to the extent that it is reasonably practicable, businesses within our supply chain and we confirm the following:

- 1) No relevant offence relating to slavery or human trafficking has been committed within our own business.
- 2) We have made enquiries of businesses that supply directly to us and are confident that no relevant offence is committed in those businesses
- 3) Insofar as it was reasonably practicable, we have examined our supply chains and found no evidence of slavery or human trafficking.

We are committed to continuous improvement in our efforts to prevent modern slavery and human trafficking. We will regularly review and update our policies and procedures to ensure they remain effective and relevant.

## 10. Contact Information

For any questions or concerns regarding this statement, please contact Emma Whitemoss, Head of Risk and Global Expansion.

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