



VIVO

Modern Slavery Statement 2023

VIVO Defence Services Ltd

Our Commitment

"The Modern Slavery Act 2015 ("the Act") requires certain businesses to set out the steps they have taken to ensure slavery is not taking place in their operations and supply chain.

VIVO are fully committed to playing our part in eradicating modern slavery."

What is Modern Slavery?



Modern slavery is an international crime that affects an estimated 45.8 million people around the world. It includes victims trafficked from overseas and vulnerable people in the UK who are forced to work against their will or are exploited. This disturbing issue transcends age, gender and ethnicity.



Jerry Moloney
Managing Director
VIVO Defence Services

About VIVO

VIVO

VIVO is the largest provider of repair and maintenance services to military estates and housing in the UK. We work for the military, the Ministry of Defence and its partners, and we're proud of the role we play in the defence of the UK and our NATO allies.

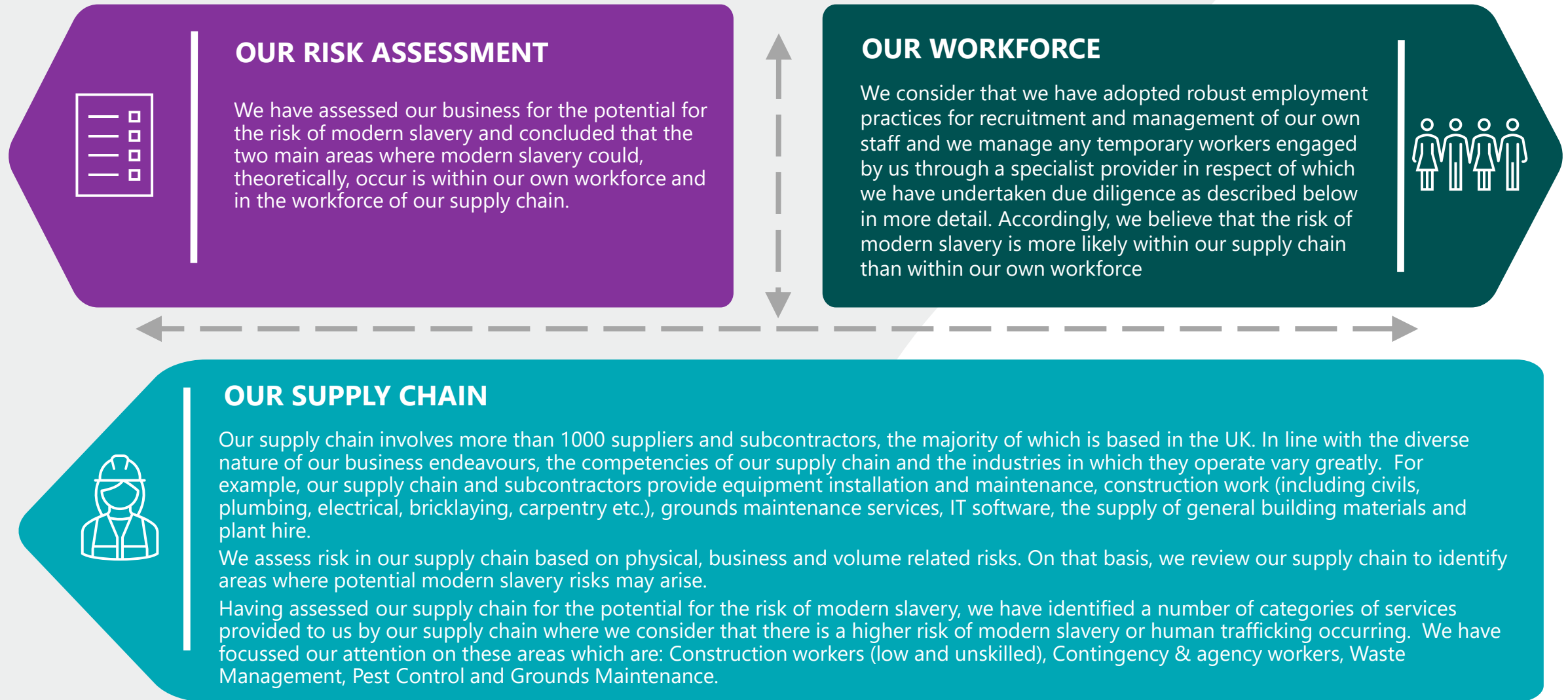
We are a relatively new organisation, formed by our two shareholders in a 50/50 joint venture to bring together their complementary strengths to create a critical partner for the MoD:

-  **EQUANS** is a global leader in facilities management and housing maintenance, and energy efficiency
-  **serco** is a global leader in business services with a proud history of working with the UK and US military, and the wider UK and international public sectors

Using the experience, capabilities and reputations of our shareholders enabled VIVO to bid for and win the largest share of estate and housing maintenance in the UK from a standing start in 2020.



Our Approach



Our Policies & Practices in Relation to Modern Slavery **VIVO**

Our Code of Conduct sets out expected behaviours in relation to ethical requirements for all employees. The Code requires every employee to take seriously their role in building and protecting our reputation, by acting in full compliance with the applicable laws and our values and ethical principles, in all our activities.

In February 2022, we published a Modern Slavery Procedure which sets out our commitment in relation to eradicating modern slavery. Within the procedure we have specifically outlined the roles which we expect our staff and leadership team to take in supporting this commitment to eradicate modern slavery in all of its forms.

Alongside the Code of Conduct and Modern Slavery Procedure, we have in place a set of policies, processes and procedures which seek to ensure that slavery and human trafficking is not taking place in our supply chain or our operations. These include:

01

VIVO's Purchasing Policy

02

Our Supplier Code of Practice, which was updated in 2023. This document outlines our expectations of our supply chain and our approach to a range of issues including modern slavery and ethical conduct of our supply chain.

03

Adoption of the Prompt Payment Code

04

Undertaking due diligence on our supply chain as described below.

05

Entering into contractual commitments with our supply chain as described below.

06

Providing our suppliers with access to a specific ethics incident reporting (whistleblowing) hotline.

07

Establishing a supplier portal to enable our supply chain to access online training.

We are committed to ceasing trading with suppliers showing persistent disregard for important elements of environmental, social and ethical performance.

Our Due Diligence process

In our own operations

We have developed an internal Ethics reporting system. This reporting system provides a place where acts of potential unethical or non-compliant behaviour, which would include modern slavery or human trafficking, can be reported for escalation. This reporting system comprises a clear mechanism for reporting of any issues and the reporter may remain anonymous if they so wish. Any matters raised are assessed through a formal investigation procedure and considered by the senior management team within VIVO.

Our people are subject to various appropriate pre-screening checks during recruitment. This includes right to work checks pre-employment and throughout employment for those individuals whose right to work is not permanent. All staff, including our suppliers, who work on our sites must have gained BPSS security clearance prior to undertaking work. As part of the clearance process, multiple forms of identification must be produced, together with address history, references, and employment history.

We ensure that the majority of temporary labour (other than some office-based workers) is sourced through our Managed Service Provision List (PSL).

This enables us to engage workers through verified suppliers of temporary labour and our contracts with these suppliers require them to adhere to the highest ethical standards.

We require these suppliers to produce an annual slavery and human trafficking report, which sets out the measures they have taken to ensure that slavery and human trafficking is not taking place within their business or supply chains.

Our contractual relationship with these suppliers of temporary labour also requires them to undertake robust onboarding checks before an individual will be engaged.

In addition to workers engaged through our PSL, on occasion we may source temporary office-based workers through other specialist suppliers. Our risk assessment has determined that these workers present a lower risk of modern slavery and so, whilst these workers will only be sourced through agencies who have agreed to our preferred supplier contractual terms, there is no requirement for those suppliers to undertake a bi-annual audit on those workers.



Our Due Diligence process

In our supply chain

Prior to their engagement, we require all suppliers to complete our supplier questionnaire and gain an approved verification from our vendor assessment partner, Constructionline. This requires the supplier to provide information regarding the risk assessment and due diligence measures they have implemented to mitigate the risk from modern slavery within their organisation and supply chain. Responses to the supplier questionnaire are subject to a desktop audit which is conducted jointly by staff from our Procurement, Health, Safety and Environment teams. During the onboarding process, these suppliers are required to confirm that they can, and will, adhere to the commitments presented within our Supplier Code of Practice. These commitments ensure that our suppliers support us in achieving our ethical ambitions, which includes adherence to the highest standards in the fields of ethics (including modern slavery), health and safety and the environment.

We have undertaken due diligence investigations on our high-risk category groups

and enhanced due diligence on all suppliers within this group was undertaken in 2023, taking the form of an ethics audit undertaken by VIVO's Ethics Officer.

In addition to the above due diligence measures, there are in excess of 900 suppliers on our preferred supplier list for FM services who are subject to an external Dow Jones financial and ethics check, which is conducted by our buying support team.

Suppliers are required to implement due diligence on their own suppliers and subcontractors to ensure that slavery or human trafficking does not exist in their supply chain. Suppliers are also required to notify us if they discover any actual or suspected slavery or human trafficking within their supply chain.



Training our employees and providers

SUPPLIERS

We have published online training modules which are available for suppliers via our supplier portal.

EMPLOYEES

Our staff are all required to undertake mandatory ethics training, entitled "Upholding our Standards". This module covers Modern Slavery Act awareness which ensures that our staff are appropriately trained to identify the signs of modern slavery and know how to report any concerns in a timely and effective manner.

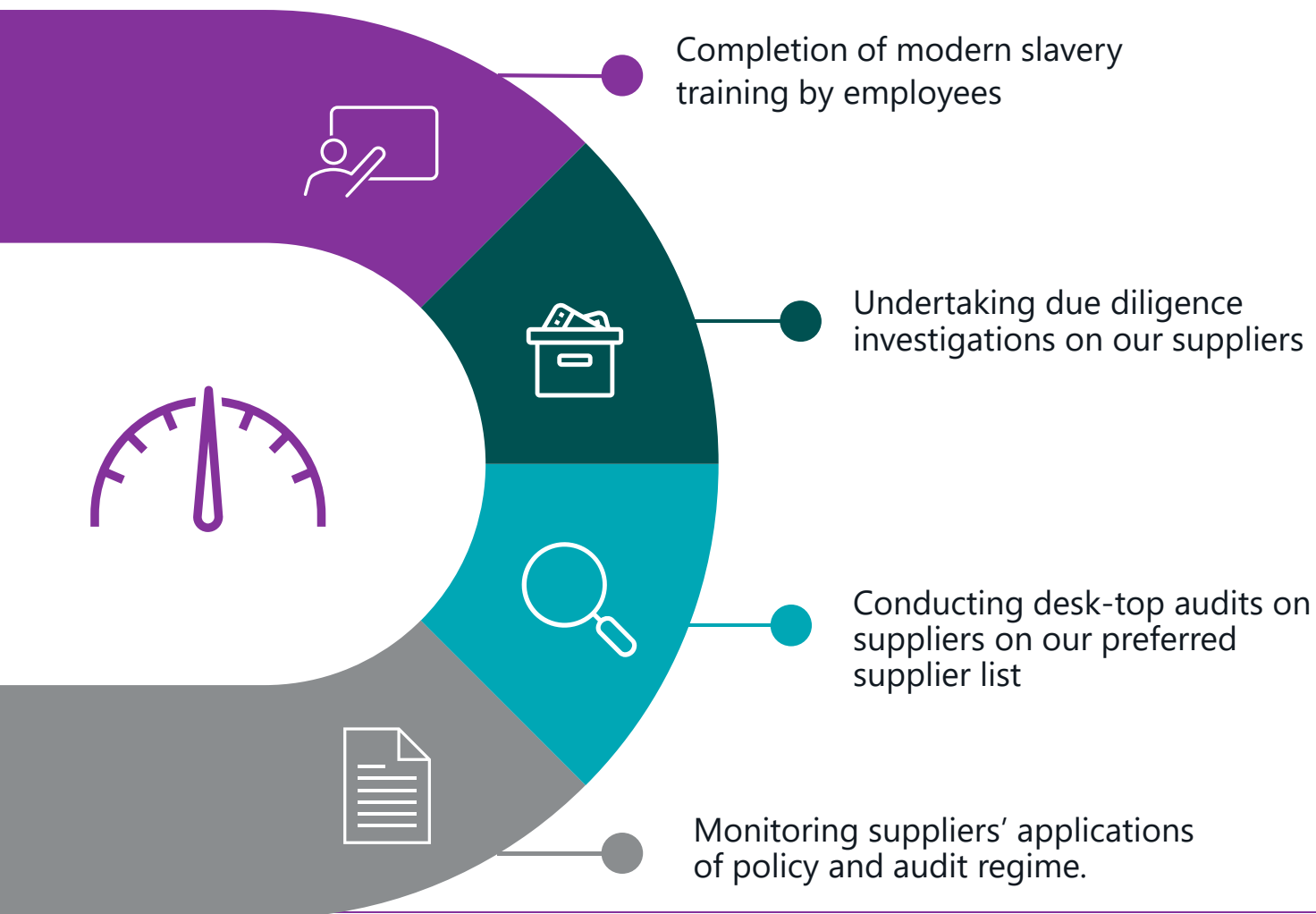
All employees are bound, by virtue of their terms of employment, by our policies, procedures and Code of Conduct



Measurement of our progress



We have developed a set of key performance indicators (KPIs) to report our performance which includes:



Our Future Plan

In 2024 we will utilise the information gained from the 2023 ethics audit of the high-risk category groups within our supply chain, to target the measures they have in place around their own suppliers and subcontractors.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for VIVO Defence Services Limited for the financial year ending 31 December 2023.

Jerry Moloney, Managing Director
VIVO Defence Services, 30th June 2024

VIVO

Working with



Defence
Infrastructure
Organisation