



Modern Slavery Statement 2024

Introduction

This statement is made pursuant to our obligations under section 54 of the UK Modern Slavery Act 2015 and sets out the steps we have taken, during the 52 weeks ended 31 December 2024, to prevent modern slavery and human trafficking in our business and supply chain.

Our commitment

VIVO Defence Services Limited ("VIVO", "we", "us", "our") is

- committed to playing our part in preventing, identifying, mitigating, and managing modern slavery risks.
- committed to high standards of ethics and integrity in all our business dealings and operations.

We recognise that modern slavery and human trafficking are serious global issues which require vigilance and attention. This report outlines the steps taken by VIVO in 2024 to address these risks.

It is our policy to comply with all applicable laws, including the Modern Slavery Act 2015, and we are committed to identifying and preventing slavery or human trafficking in our organisation and supply chain.

What is Modern Slavery?

Modern slavery is an international crime that affects an estimated 40 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.

VIVO in numbers

As at 31 December 2024, the Company employed around 1560 people. In 2024, Company revenue was £916m. We remain committed to preventing all aspects of modern slavery and recognise that we have a responsibility to be alert to the risks.

VIVO

VIVO is the largest provider of repair and maintenance services to military estates and housing in the UK. We are solely dedicated to 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.

VIVO provides asset and facilities management services for the government's Defence Science and Technology Laboratory (Dstl) in their southwest region and looks after eight of the 13 UK regions of the Volunteer Estate - this provides sites for the nation's military reservists and cadets. VIVO provides Housing Maintenance and FM services for 11 United States Visiting Forces (USVF) sites across England and Wales.

VIVO, is a 50:50 joint venture between Serco and Equans, bringing 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*

Further information about VIVO can be found on our [website available here](#).

Our Risk Assessment

The two main areas where modern slavery could, theoretically, occur is within our own workforce and in the workforce of our supply chain.

Our Workforce

VIVO has robust employment practices for recruitment and management of our own staff and we manage any temporary workers engaged by us through a specialist provider in respect of which we have undertaken due diligence as described below in more detail.

Our Supply Chain

Having assessed our supply chain for the potential for the risk of modern slavery, we have identified a number of categories of services provided to us by our supply chain where we consider that there is a higher risk of modern slavery or human trafficking occurring. We have focussed our attention on these areas which are:

- Construction workers (low and unskilled)
- Contingency and agency workers
- Waste management
- Pest control
- Grounds maintenance

VIVO deal with a large number of suppliers, based in the UK. Our supply chain provides equipment installation and maintenance, construction work (including civils, plumbing, electrical, bricklaying, carpentry etc.), grounds maintenance services, IT services, the supply of general building materials and plant hire.

Of our 10 largest suppliers, which account for a significant portion of total spend, 6 of these fall within the scope of section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

Statistics

Constructionline provides a validation service for buyers, ensuring suppliers meet certain criteria. This includes assessment by Constructionline of each Gold supplier’s compliance with the Modern Slavery Act.

In 2024, we assessed our direct supplier base and found 29 % of our core service spend was with 10 suppliers which had been assessed as having an Constructionline Gold, or higher, rating, indicating that they had a higher level of maturity and lower level of risk and 90% of our supply chain supplying services hold Constructionline Gold, or higher, rating.

Our people

Our people are subject to appropriate pre-screening checks during recruitment. This includes Right to Work checks both pre-employment and throughout employment for those individuals whose Right to Work is not permanent.

In July 2024 VIVO updated the operating procedure for the **Procurement of Consultants, Contractors and Temporary Workers**. All temporary labour requests are approved by VIVO’s HR Director. We ensure that the majority of temporary labour (other than some office-based workers) is sourced through our Managed Service Provision List. 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.

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 Managed Service Provision List, 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. Therefore, 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 code of conduct

Our **Business Conduct and Ethics policy** sets out the principles of behaviour for our people. Our **Code of Conduct** empowers our people to take positive steps to ensure that we hold ourselves accountable to the highest standard of behaviour in relation to all business conducted on VIVO’s behalf. These standards reflect our values of **Open, Caring**



Agile and Collaboration and provide direction on compliance with relevant laws and regulatory requirements; this is enhanced through being VIVO minded Culture.

Our **Ethics Policy and Reporting Procedure** 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. There is a clear mechanism for reporting 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 Ethics Officer within VIVO.

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:

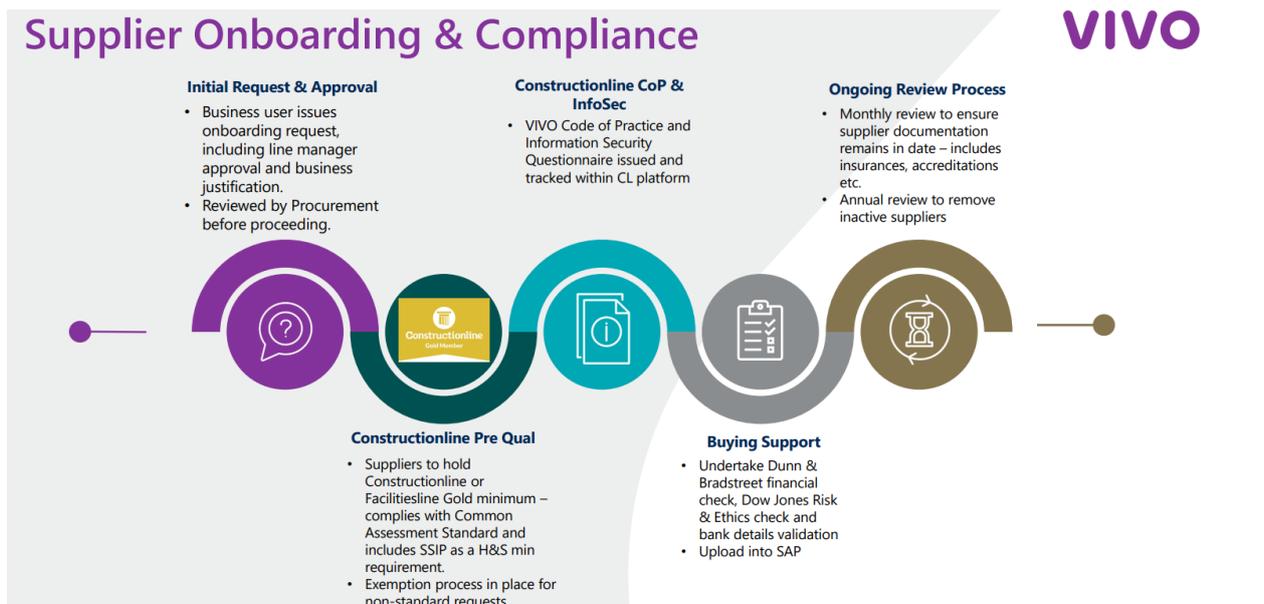
- VIVO’s Purchasing Guidelines.
- Our **Sustainable Procurement Policy** and **Supplier Code of Practice**. These documents outline our expectations of our supply chain and our approach to a range of issues including modern slavery and ethical conduct of our supply chain.
- Our **Human Right Policy** and our standard operating procedures for **Bullying and Harassment; Equality, Diversity and Inclusion; Procurement of Consultants, Contractors and Temporary Workers; and Talent Acquisition Screening & Vetting**.
- adoption of the Prompt Payment code.
- undertaking due diligence on our supply chain as described below.
- entering into contractual commitments with our supply chain as described below.
- providing our suppliers with access to a specific ethics incident reporting (whistleblowing) hotline.
- establishing a supplier portal to enable our supply chain to access online training.

We assess instances of non-compliance, of which we become aware, taking appropriate remedial action as expeditiously as possible.

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

Our due diligence process

We work to ensure that proportionate risk based due diligence is completed on third parties (suppliers, agents, strategic partners and customers). In 2024, we strengthened the third-party business integrity screening system. A key reason was to enable VIVO to screen third parties for human rights, modern slavery and forced labour concerns. Training and guidance documents were provided to support the launch of this new process.



The onboarding compliance process is shown above.

All VIVO suppliers are onboarded to an Approved Supplier List managed by the Procurement Team. This is set out further in the **FDIS Supply Chain Management Plan** which was in development during 2024 and published in January

2025. VIVO’s minimum pre-qualification standard for suppliers undertaking works on our sites is Constructionline Gold or Facilitiesline Gold – this ensures that all our supplier meet our minimum standards with regards to:

- Health and Safety
- Environmental Management
- Quality Management
- Equal opportunities and diversity
- Modern Slavery Act adherence
- Anti-bribery and anti-corruption policies

Constructionline assesses suppliers using Common Assessment Standard, a standardised prequalification questionnaire (PQQ) for the construction sector. It aims to streamline the construction procurement process by providing a unified set of questions for assessing suppliers.

In addition to the Constructionline accreditation:

- VIVO undertakes both a Dunn & Bradstreet financial check and a Dow Jones Risk and Ethics assessment. Flags on either assessment are reviewed in the first instance by the Head of Supply Chain and referred to the relevant Head of Commercial should a risk-based decision be required.
- Our Code of Conduct is incorporated by reference in our standard terms and conditions. Suppliers are asked to read and sign the Supplier **Code of Practice**; this sets out the expectations we have of our suppliers and other third parties with which we work. 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.

Monitoring

Our Performance Management of our Supply Chain is improving and VIVO have implemented a system which includes quarterly 121 sessions with Tier 1 Suppliers to actively monitor performance.

Responsible business

We have an ongoing audit project to strengthen our risk assessment and risk management in our supply chain. Building on our Supplier Conduct of Practice and enhanced supplier screening system, we are committed to improving supply chain transparency, improving how we assess and manage sustainability risks in the supply chain, and partnering with suppliers who share our commitments.

We continue to carry out paper and online checks on key direct suppliers, including checking their position on modern slavery. Our leadership teams conducted site visits and speak with key suppliers to better understand their operating environment and potential risk areas.

Training

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

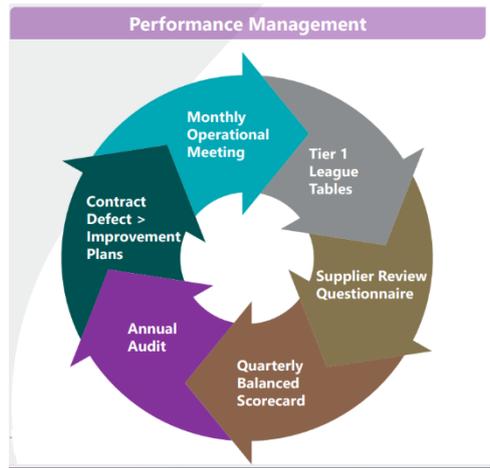
All employees are bound by virtue of their terms of employment, by our policies, Procedures and Code of Conduct.

No concerns raised on modern slavery in 2024

No reports were received via our Ethics Point hotline or other speak up channels regarding modern slavery or human rights concerns.

Measurement of our progress

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



In 2023 we stated our KPIs	Against this we have performed:
Completion of modern slavery training by employees	The VIVO Foundations – Upholding our standards course is mandated for 100% of all employees. Compliance is managed via line managers via weekly reporting on those outstanding. We currently have over 2800 completions

Undertaking due diligence investigations on our suppliers	Completed on ConstructionLine
Conducting desk-top audits on suppliers on our preferred supplier list	Completed on ConstructionLine together with targeted specific supplier audits
Monitoring suppliers' applications of policy and audit regime	Completed on ConstructionLine

Our future plan

In 2025 we will:

- Review the Modern Slavery process and training
- follow up on selected suppliers following due diligence responses to understand their management of modern slavery in their supply chain and take any corrective actions
- host regional supplier days to work with our supply chain to raise awareness and promote best practice
- Continue to monitor through the ConstructionLine tools application of policies
- continue and further improve the outcomes of the 121 audits with our Tier 1 suppliers.

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 2024.



Jerry Moloney
 Chief Executive Officer
 VIVO Defence Services

Date: 27 May 2025