

Ventol Limited is committed to driving out acts of modern-day slavery, human trafficking or illegal workers within its business and within its supply chains, including sub-contractors, and partners.

Definitions

For the purposes of this policy, the following terms are defined in line with the Modern Slavery Act 2015 and recognised international standards:

- **Modern Slavery** – The recruitment, movement, harbouring or receiving of persons through force, coercion, abuse of power or deception for the purpose of exploitation.
- **Forced or Compulsory Labour** – Work or service extracted from any person under the threat of penalty and for which the person has not offered themselves voluntarily.
- **Human Trafficking** – Arranging or facilitating the travel of another person with a view to that person being exploited.
- **Servitude** – A condition in which the freedom of a person is significantly restricted, and they are obliged to provide services for others.
- **Child Labour** – Work that deprives children of their childhood, dignity, or potential, and is harmful to physical or mental development.
- **Debt Bondage** – A situation where a person is forced to work to repay a debt under terms that are exploitative or impossible to meet.

The Company acknowledges responsibility under the Modern Slavery Act 2015 and other applicable legislation and will ensure transparency within the organisation and with its suppliers of goods and services.

Right to work, Identity Verification & Security Screening

Ventol Limited carryout pre-employment digital identity verification through National Security Screening Agency (NSSA) in line with BS7858:2019 and the documents used to verify the right to work are compliant with the latest Home Office guidance for employers on preventing illegal working and ensure that those we employ are entitled to work in the UK in accordance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006. NSSA also verify the applicant against the BPSS (Baseline Personnel Security Standard). **These controls are also applicable to subcontractors that make up the supply chain of Ventol Limited.**

All current employees and subcontractors undergo periodic reassessment to verify Right to Work in the UK as part of the recertification of required security clearances for work in Government facilities. All related verified documentation is retained for a minimum of 2 years after the individual has ceased employment with Ventol Limited.

Risk Assessment

Ventol Limited undertakes ongoing assessment of modern slavery risks within its operations and supply chain. This includes consideration of:

- **Geographical risk** – Countries or regions with known higher prevalence of forced labour or weak labour protections.
- **Sector and product risk** – Goods or services historically associated with exploitation (e.g., raw materials, manufacturing, logistics).

- **Supplier risk** – Supplier size, subcontracting practices, transparency, and previous compliance performance.
- **Labour model risk** – Use of temporary, migrant, or agency labour.

Risk assessments are reviewed annually or sooner if significant changes occur within the supply chain. Higher-risk suppliers may be subject to enhanced due diligence, including additional documentation requests or audits.

Supplier Due Diligence

As part of the company's due diligence processes into slavery and human trafficking, the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

Actions, Mitigations and Training

Ventol Limited implements a range of measures to prevent modern slavery and illegal working, including:

- **Mandatory Training** – All employees and subcontractors receive induction training on modern slavery awareness, recognising indicators of exploitation, and reporting procedures. Refresher training is provided annually.
- **Supplier Expectations** – Suppliers are required to confirm compliance with the Modern Slavery Act 2015 and demonstrate appropriate controls within their own operations and supply chains.
- **Ongoing Monitoring** – Periodic reassessment of employees and subcontractors as part of security clearance recertification, including verification of Right to Work documentation.
- **Resource Commitment** – Directors and senior management ensure adequate resources, training, and oversight are in place to support effective implementation of this policy.

Transparency and Continuous Improvement

Ventol Limited recognises that full visibility of all tiers of the supply chain can be challenging. We are committed to improving transparency, strengthening due diligence processes, and enhancing our understanding of modern slavery risks. We will continue to review our practices, engage with suppliers, and update this policy to reflect evolving best practice and legislative requirements.

Reporting Concerns and Grievance Mechanisms

Ventol Limited encourages all employees, subcontractors, suppliers, and third parties to report any concerns relating to modern slavery, human trafficking, or illegal working. Concerns may be raised through any of the established whistleblowing channels, including:

- **Line Manager or Supervisor**

- **HR Department**
- **Compliance or Senior Management Team**
- **External reporting**, including the Modern Slavery Helpline (0800 0121 700)

Reports may be made confidentially, and anonymous disclosures will be considered where sufficient information is provided.

Ventol Limited operates a strict non-retaliation approach. Individuals raising concerns in good faith will not suffer any detriment or adverse treatment because of reporting suspected wrongdoing.

Recognising Red Flags

Employees and subcontractors should remain alert to potential indicators of modern slavery, including but not limited to:

- Workers appearing fearful, withdrawn, or unable to speak freely
- Confiscation of passports or identity documents
- Signs of physical abuse, malnutrition, or poor living conditions
- Excessive overtime or workers being transported to and from site under supervision
- Workers receiving little or no pay, or being indebted to recruiters or supervisors
- Inconsistent or suspicious documentation

Any red flags must be reported immediately using the reporting mechanisms outlined above.

Governance & Accountability

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives. They shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking are not taking place within the organisation and within its supply chains.

Policy availability & Review

A full copy of this policy and the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request.

This policy statement will be reviewed annually and published.

Signed on behalf of Ventol Limited



Managing Director

Reviewed: 16 / 04 / 2026
Next Review: 10 / 10 / 2026