

# COMPLIANCE STATEMENT & HUMAN TRAFFICKING ACT 2015

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## Introduction

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This statement sets out Vision Support Services Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring, where reasonably practicable, that no slavery or human trafficking occurs within its own business and its supply chains.

As part of our global supply chain, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Vision Support Services Ltd is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain, and our products.

We realise that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse. Therefore throughout this statement, we, Vision Support Services Ltd. use the terms 'slavery and human trafficking' to encompass all these various forms of coerced labour.

As outlined in detail below, we take certain steps, to ensure that slavery and human trafficking are not taking place in our supply chains or other parts of our business. Our financial projections lead us to believe that our first published Slavery and Human Trafficking statement will be published in the financial year 2016/2017. We acknowledge that this is a work in progress and aim to review all aspects of our supply chain within the next five years.

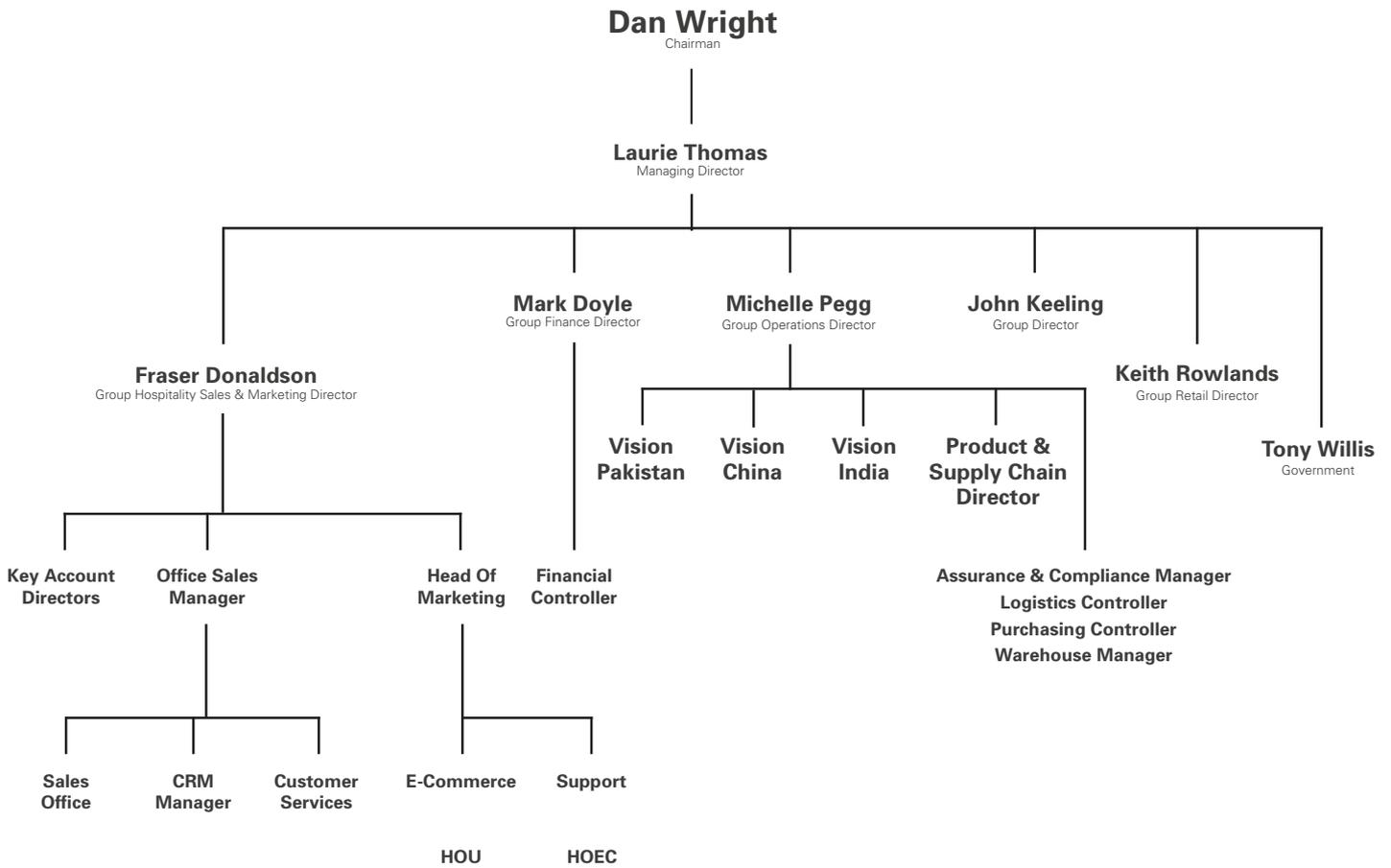
To this end, we have established an integrated approach to managing human rights across our business, including risks related to slavery and trafficking. Organisational structure and supply chains.

This statement covers the activities of Vision Support Services Ltd:

Vision Support Services Ltd. is the leading supplier and distributor of luxury, performance and specialist textiles in the global accommodation, retail and healthcare markets

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# Organisational Chart



## Countries of operation and supply

The organisation currently operates in the following countries:

United Kingdom	China
Ireland	Turkey
India	Dubai
Pakistan	

We assess whether or not particular activities or countries are a higher risk in relation to slavery or human trafficking by:

Undertaking a stringent risk assessment process in relation to our operations inside and outside the UK.

Firstly by an initial written questionnaire to be completed by all of our key suppliers, ensuring that they, the supplier, have strong anti-slavery or human trafficking policies in place, and these policies are enforced, and also that they, the supplier (and their manufacturing/supply chains) are also fully compliant with the Modern Slavery Act of 2015.

Secondly, by having our own premises and representatives in each country of supply which allows us to carry out spot checks on site and have ready access to “on the ground” information can be obtained to oversee this process. We also ensure that our Purchase Controller and Operations Director regularly visit our supply partners .

Thirdly, by independent audit of our suppliers through accredited auditing bodies (BSCI/SMETA).

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## High-risk activities

The following activities are considered to be at a higher risk of slavery or human trafficking:

The manufacture and production processes for our product lines, is not UK based so any workforce involved in this manufacturing process could potentially be exploited/ be at high risk in relation to slavery or human trafficking, thus failing to meet one or more areas of policy and so not being compliant with the Modern Slavery Act of 2015. Our Labour Standards Assurance System, which is third party verified via Eco Vadis and presence in manufacturing countries are used to mitigate this risk.

## Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- Our Assurance and Compliance Manager is responsible for putting in place any anti-slavery initiatives / human trafficking policies. They also hold the responsible for the regular review of these policies and the processes by which they were developed/ are being developed to be within guidelines.
- Our Assurance and Compliance Manager has broad organisational responsibility for human rights and modern slavery risk analysis, looking at processes/ ongoing reviews/ regular actions in this area to ensure Vision Support Services Ltd. are compliant, meeting the requirements of the act.
- The Operations Director has responsibility to ensure we meet our anti-slavery or human trafficking policies and responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. This is achieved by the undertaking of reviews of the supplier's statements of compliance. Steps are taken to verify, evaluate and address risks of slavery of any form in the supply chain.

## Training

Vision Support Services Ltd has provided training to key staff with responsibility for compliance to the Act.

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## Relevant Policies

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**The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:**

### **Whistleblowing Policy**

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report it in a number of ways either by using the Modern Slavery Website <https://modernslavery.co.uk/report-it.html> or by calling on 0800 0121 700 or by following our Whistleblowing Policy.

### **Employee code of conduct**

The organisation's code is outlined in the Corporate and Social Responsibility Policy and our employee's handbook makes clear to all employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour at all times

### **Supplier/Procurement code of conduct**

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. We require all chains of supply/ procurement routes to complete a statement of compliance in relation to the Modern Slavery Act 2015.

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### **Recruitment policy**

The organisation uses only specified, reputable employment agencies to source our labour and always verifies the practices of any new agency we may wish to work with, before accepting any workers or placing recruitment requirements for employees from that agency.

### **Any other policies relevant to the organisation's business or sector.**

Our organisation has a policy, as outlined in our employee's handbook, that remuneration is above the minimum wage level. We ensure all employees have the right to work in the United Kingdom.

As part of our labour standards assessment, we also ensure that our suppliers are paying their workers in accordance with local legislation.

### **Due diligence**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
  - Evaluating the modern slavery and human trafficking risks of each new supplier, we undertake a full review of all new suppliers, requiring their written statement of compliance to the Modern Slavery Act of 2015, giving 30 days maximum notice to provide a statement of compliance.
  - Seeking demonstration of effective modern slavery and human trafficking policies and practices to be in place before beginning trading.
  - Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
  - Conducting supplier audits and assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
  - Reviewing of previous independent reports (SMETA ,BSCI) to look at trends, improvements or areas for improvement.
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# Performance Indicators

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## Indicators 2017

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- Requiring designated staff to have completed training on modern slavery by August 2017;  
This was successfully completed by July 2017.
  - Reviewed the system for supply chain verification  
This has been completed
  - Reviewed our existing supply chains expected to be completed by January 2018.  
This was completed and the results have formed our programme for 2018 to 2021.
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## Indicators 2018 to 2021

Sector	Probability in Sector	Probability in Geographical	Overall Risk	Action
Finance	Low	Low	Low	Keep under review
Micro	High	Medium	High	Further analysis required
Service Industry	High	Medium	High	Further analysis required
Logistics	Medium	Medium	Medium	Keep under review
Textile	High	High	High	Further analysis required
Hire Companies	Medium	Medium	Medium	Keep under review
Auditors	Low	Low	Low	Keep under review

The above conclusion have aided the establishment of indicators going forward.

### 2018

We will look to analyse and review the Micro, Service and Textile industries. Formulating action plans that will aid us in understanding the problems and potential issues in these sectors and working through mitigations with our suppliers.

### Update

This review was undertaken. A lack of understanding of the provisions of the Act and a lack of knowledge that this had entered the statute books has resulted in a lack of understanding when the review took place. This has been addressed with our micro suppliers and although the probability in the sector as a whole remains high, we firmly believe that within this sector of our supply chain no modern slavery exists.

### 2019 to 2020

We will continue our work from 2018 and review all sectors that are not seen as low risk areas. Action plans and communication initiatives to be developed to be able to proactively look at these sectors.

### 2021

A full review will commence.

## Awareness

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### Awareness-Raising Programme

It is our intention during the next financial year to raise awareness of modern slavery issues by putting up posters across the organisation's premises and using the monthly staff newsletter to ensure that this issue remains prominent.

This was achieved in 2018. Modern Slavery awareness was also embedded for all staff within the companies induction programme.

Through our awareness programme we have also aided one of our large international suppliers in becoming compliant with the Modern Slavery Act. They now display their statement prominently on their web site and have started to review their supply chain as a whole.

### We explain to staff:

- The basic principles of the Modern Slavery Act 2015;
  - How employers can identify and prevent slavery and human trafficking;
  - What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.
  - What external help is available, for example through the Modern Slavery Helpline.
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## Board Approval

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This statement has been approved by the organisation's board of directors, who will review and update it annually.

**Signature:**

**Director:**

**Date:**

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