

# Modern Slavery Act Policy Statement



## Purpose

This Policy Statement outlines how Vercity Group complies with the Modern Slavery Act 2015, which sets out a range of measures that define how businesses should respond to such requirements, in particular Section 54 concerning supply chains.

## Scope

This Statement outlines the steps Vercity Group is taking to ensure compliance with the statutory requirements.

Modern slavery is the term used to encompass slavery, forced and compulsory labour, and human trafficking.

## Responsibilities

- Vercity Group is required to publish a “Slavery and Human Trafficking” statement for each Financial Year. This will be approved by Executive Board and signed by the CEO annually.
- All Vercity Group employees should be alert to the risks brought about by modern slavery that could affect our business and supply chains. Staff should report any concerns to their designated management representative, who will take the appropriate action.

## Statement

### 1 Organisation

- 1.1 Vercity Group is responsible for providing management services to Special Purposes Vehicles (SPVs)/Project Companies that are ‘owned’ by Infrastructure Investors. Each SPV has a management team that includes personnel from Vercity Group who oversee the day to day running and operation of the contract on the Project Company’s behalf, with the majority of activities directly contracted out to third party suppliers.
- 1.2 Vercity Group also provides consultancy services to SPVs/Project Companies and external clients through bespoke contracts and service delivery plans. In certain instances, or for specialist works, this may require the appointment of third-party sub-consultants and/or suppliers.
- 1.3 Where Vercity Group provides management services to Project Companies, it will assist the SPV in tackling the threat of human trafficking and modern slavery.
- 1.4 Where Vercity Group directly employs suppliers or sub-consultants, it will seek to work in partnership with these parties to tackle the threat of human trafficking and modern slavery across our business operations and throughout our supply chain, which will be achieved through compliance with relevant international environmental, social and ethical standards.

## 2 Our Supply Chains

Vercity Group's direct supply chains are very limited, consisting of UK and Canadian based consultants and contractors. We only use reputable and registered companies for the provision of services, who have all been formally vetted and approved by a Executive Board director prior to appointment.

Vercity does not produce goods and does not have any manufacturing or retail activity; accordingly, the Company does not form part of any supply chain in relation to such activities.

## 3 Due diligence and implementation processes for slavery and human trafficking

As part of Vercity Group's initiative to identify and mitigate risk (including that of human trafficking and slavery), the Company operates a range of policies and procedures that form part of the business's management system. These documents are available to all staff to ensure such practices are embedded at all levels, and within all business undertakings.

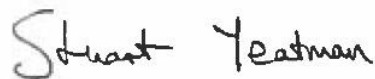
## 4 Communication

Vercity Group will publish this statement via the Company's website to ensure it is available to all stakeholders, communicating a high level of understanding of the risks of modern slavery and human trafficking that could affect our business.

## 5 Legal and regulatory purpose of this statement

This statement is made to align with the obligations arising under section 54(1) of the UK Modern Slavery Act 2015 (the Act). This statement should be considered to constitute the slavery and human trafficking statement for Vercity Group for the current financial year and all future financial years until it may in future be modified or amended.

This Statement will be reviewed following changes to legislation and/or identification of any new Modern Slavery risks. In all other cases, it will be reviewed annually as required by the Act.



Signed

Name: Stuart Yeatman  
Position: Chief Executive Officer  
Date: 28-11-2022