



## **Slavery and Human Trafficking Statement for the Financial Year 2018**

This statement sets out the steps the Company has taken during the financial year ending 31 December 2018 to ensure that slavery and human trafficking is not taking place in any of our supply chains, and in any part of our own business. Vita manufactures, converts and markets flexible polyurethane foam and associated products from sites across Europe and one in China. We source raw materials used directly in foam manufacture and indirect sundry supplies, used in supporting the business, from multi-national and local organisations.

Vita recognises its responsibilities as an international business and aims to encourage and sustain high standards of corporate responsibility in everything we do. It is an organisation which aims to promote good ethical, labour, health & safety and environmental standards in our own businesses and in those within our supply chain. This involves ensuring employees and people in the supply chain are treated with respect and have employment rights including rights to freely choose employment, freedom of association, working hours that comply with national laws, equal opportunities, recognised employment relationships, freedom from intimidation and a safe and healthy working environment. Vita exercises zero tolerance towards any form of forced labour, child labour, slavery and human trafficking. We would never knowingly conduct business with suppliers or contractors engaged in such practices.

Vita's Code of Business Conduct sets out our standards in relation to corporate responsibility. This Code is available on the company's intranet in 13 languages. It is widely communicated within the organisation and through our supply chain, including through our Compliance Training Programme for employees who work directly with customers and suppliers as well as our senior managers, agents and Non-Executive Directors.

Vita operates a Whistleblowing Policy that encourages employees to report any malpractice or violation of our ethical standards. All matters raised either via whistleblowing or through our auditing processes are diligently investigated and appropriate action is taken in accordance with the Group's compliance standards. Face to face training on compliance issues and the whistleblowing process takes place every two years. This explores realistic scenarios on topical compliance matters and explains how to raise concerns to make sure our managers understand the part they play in ensuring all employees are aware of the policy. In addition, Vita's shareholder changed in 2018 when Strategic Value Partners, LLC or its affiliates ("SVP Global") acquired the business. Incoming Board members and Non-Executive Directors have been briefed on Vita's Code of Business Conduct and its strong suite of compliance policies. They are wholly supportive of Vita's training and policies in this important area.

Vita's Supply Chain Responsibility Policy outlines Vita's expectations of its relationships with its supply base; this includes; Vita's Purchasing Code of Ethics, Ethical Standards, Environmental Standards and Health & Safety Standards. Vita works collaboratively with suppliers in pursuit of this policy. It is our aim to guide all our supplier relationships by the principle of continual improvement. This policy is presented to Vita's leading direct suppliers biennially during face to face meetings.

Vita has considered the risks of forced/child labour in its supply chain in the following ways:

1. Countries – some countries have a higher risk.

China remains on Tier 3 of the Trafficking in Persons Report 2018 (Source: US Trafficking in Persons Report 2018 <https://www.state.gov/j/tip/rls/tiprpt/2018/>), this is the only country on Tier 3 where Vita has an operating business. Our business in China is managed by a senior manager with 30 years' service in the UK. This manager relocated to Changshu and works closely on a daily basis with the local managers and workers. He is alert to the issues present in a country whose government has been recognised as not fully meeting the Trafficking Victims Protection Act's (TVPA) minimum standards. The business submits a monthly report direct to a member of the senior leadership team; who also liaises weekly via phone and/or email with the Country Manager. In addition, a member of the senior leadership team visits the site twice a year and the General Counsel and Company Secretary has recently been appointed legal supervisor for the China facility.

Vita has a production plant in one country (Hungary) on the Tier 2 Watch List (indicating the governments do not fully meet minimum standards and exhibit additional concerns). Our business complies with Vita Group standards and we continue to pay particular attention to our business with respect to this issue.

Vita continues to monitor and provide additional support to managers in its production sites in Tier 2 countries (Albania, Bulgaria, Croatia, Romania and Serbia).

2. Raw materials – certain products have a higher risk such as agricultural products or mining.

The highest risk raw material used by Vita is a tin based catalyst, used in the production of foam. Tin is one of the conflict minerals, which are identified as having a high risk of mining by forced/child labour and the proceeds used to finance conflicts. To mitigate this risk Vita introduced a procedure pre-2013 to check where tin supplied to Vita is sourced.

Vita has two tin suppliers and these have completed the CFSI (Conflicts Free Sourcing Initiative) Conflict Minerals Reporting Template. In each case this confirms tin supplied to Vita is not sourced from countries with a risk of using forced/child labour.

Vita through its Directors and Senior Management is responsible for the application of our policies and for ensuring all activity is guided by these policies. The Directors will continue to develop our policy and strategy towards ethical working practices each year and we continue to brief on and advocate best practice within our supply chain.



Jon Cheele  
Group CEO and Director Vita (Holdings) Limited