

## Modern Slavery Policy

### 1 INTRODUCTION

- 1.1 This policy (the “**Policy**”) sets out the approach of V.Group towards modern slavery compliance.
- 1.2 This Policy:
- (a) forms part of V.Group’s Compliance & Ethics Policies which are available at <https://vgrouplimited.com/legal/compliance/>;
  - (b) applies to all Colleagues;
  - (c) has been approved by the General Counsel of V.Group;
  - (d) may be amended by V.Group at any time, consistent with the requirements of applicable laws and regulations. Any revisions will take effect from the date on which the amended Policy is published, as indicated by the version number; and
  - (e) should be read in conjunction with V.Group’s Modern Slavery Statement (which can be found at <https://vgrouplimited.com/legal/compliance/>).
- 1.3 Any breach of this Policy will be taken seriously as V.Group has zero-tolerance towards slavery, human trafficking or child labour.
- 1.4 Any questions or concerns about the operation of this Policy, including whether this Policy has been followed, should be referred to Group Legal by contacting [legal@vgrouplimited.com](mailto:legal@vgrouplimited.com)

### 2 DEFINITIONS

- 2.1 “**Colleague**” means any employee of V.Group;
- “**Group Legal**” means the legal function of V.Group (which may be contacted via [legal@vgrouplimited.com](mailto:legal@vgrouplimited.com)); and
- “**V.Group**” means AI Mistral Topco Ltd and its subsidiaries and/or affiliates.

### 3 WHAT IS MODERN SLAVERY?

- 3.1 Modern slavery is anything that amounts to slavery, human trafficking, forced labour or child labour.
- 3.2 V.Group does not tolerate any modern slavery in its own business or supply chains.

### 4 CONSEQUENCES OF BREACH

- 4.1 Any involvement in modern slavery, can result in civil and criminal penalties for V.Group and its Colleagues. Such conduct would also likely cause significant and long-term harm to V.Group’s reputation. With respect to V.Group’s customers or counterparties, V.Group reserves the right to terminate immediately any business relationship that violates or presents the risk of violating this Policy or any modern slavery laws.

## **5 MEASURES**

### **5.1** V.Group adopts the following and any other appropriate measures:

- (a)** Due diligence
  - (i)** undertaking due diligence when considering taking on new suppliers and clients, and review agreements with existing suppliers and clients (due diligence includes V.Group's 'Know Your Client' process to ensure that certain minimum criteria for new business are met and ensuring that any crewing agreement is in line with International Transport Workers Federation (ITF) agreements); and
  - (ii)** undertaking due diligence when considering acquiring new businesses.
- (b)** Recruitment
  - (i)** V.Group's crewing offices must be compliant with the Maritime Labour Convention (MLC); and
  - (ii)** where V.Group recruit externally, only approved recruitment and placement centres who are independently approved to be MLC compliant can be used.
- (c)** Seafarer employment contracts
  - (i)** every crew member who V.Group engages (whether as agent on behalf of a principal or directly) must be party to an employment contract which is MLC-compliant.
- (d)** Supply Chain
  - (i)** V.Group's supply chain business has in place the following which must be complied with:
    - (A)** Supplier Code of Conduct (setting out the standards expected of suppliers); and
    - (B)** Procurement Policy (setting out our own standards expected of Colleagues).
- (e)** Contracts
  - (i)** when starting the contracts process, propose our group template contracts which require that our clients and suppliers comply with modern slavery law.

## **6 RELEVANT POLICIES**

### **6.1** V.Group has the following policies in place which help support the effectiveness of this Policy and should be referred to as appropriate:

- (a)** Corporate Social Responsibility Policy;
- (b)** Recruitment Policy;

- (c) Seafarers' Charter; and
- (d) Speak Up Policy.

## **7 INTERNAL REPORTING**

**7.1** You must immediately contact Group Legal if any of the following occur:

- (a) if any modern slavery issues arise; or
- (b) if there is any actual or suspected breach of this Policy.

**7.2** As appropriate, Group Legal may contact the Modern Slavery Helpline on 0800 0121 700 for further assistance.

## **8 DOCUMENT CONTROL**

**8.1** The General Counsel of V.Group is the owner of this Policy and is responsible for ensuring that it is reviewed in line with the relevant review requirements.

**8.2** A current version of this Policy is available at <https://vgrouplimited.com/legal/compliance/>

**8.3** This Policy was approved as stated in this Section and is issued on a version-controlled basis.

<b>Version</b>	<b>Date of Issue</b>	<b>Approved by</b>	<b>Position</b>
1	29.03.2019	Deborah Grimason	General Counsel & Company Secretary