POLICY



Modern Slavery Act Vertas Group Statement

Introduction

The Modern Slavery Act 2015 places an obligation on UK businesses with a turnover of over £36 million to produce a modern slavery statement. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for this financial year.

The statement sets down our Groups commitment to preventing slavery and human trafficking in all our business activities and group companies as well as the steps we have in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Colleagues are expected to report their concerns and management to act upon them.

Vertas Group is the trading name of Suffolk Group Holding and this statement includes all companies within the Group, and we have examined the risk of modern slavery within its business operations and considers the risk to be low. The assessment is based upon the nature of the businesses, and that all businesses within the Group operating their services solely in the UK.

Organisational Structure

Vertas Group is a multi-services FM organisation operating throughout the UK. The Group consists of 12 registered companies; these are:

1. Vertas Group Limited, registration 07728211
2. Vertas (Ipswich) Limited, registration 10040474
3. Verse Facilities Management Limited, registration 09720915 (Joint Venture)
4. Churchill Catering Limited, registration 03233257
5. Oakpark Security Systems Limited, registration 03076175
6. Vertas (Derbyshire) Limited, registration 10699715 (Joint Venture)
7. Concertus Design and Property Consultants Limited, registration 08366439
8. Concertus Derbyshire Limited, registration 12335295 (Joint Venture)
9. Opus People Solutions Group Limited, registration 09041980
10. Opus Teach Limited, registration 10894624
11. Opus People Solutions (East) Limited, registration 10449174
12. Vertas (Nottinghamshire) Limited, registration 16319297 (Joint Venture)

Suffolk Group Holdings (trading as Vertas Group) is a wholly owned subsidiary company of Suffolk County Council and is managed by our CEO, 5 Board of Directors, and 4 Non-Executive Directors.

We adopt a stringent procurement process which is controlled by our Group Head of Procurement and Process and Compliance Manager. Suppliers to Vertas Group are reviewed and audited to ensure they have adequate policies in place to meet with the statutory requirements of the Modern Slavery Act 2015. This in turn confirms to us that the risk of slavery in our supply chain has been mitigated.



Our Supply Chains

Vertas Group provides outsourced food, cleaning, architectural design and support services to our clients across the UK. We only operate within the UK, however due to the wide facilities support services we offer we utilise a broad range of suppliers.

Our supply chains include but not limited to:

- Agency staff
- Cleaning Products
- Food items (fresh and sundry)
- Building and maintenance contracts
- PPE and workwear
- Specialist contractors

We remain committed to eradicating slavery and human trafficking through a combination of risk assessment, collaborative working, procurement policies, procedures, and audit activities which help us to identify, mitigate and manage the risk.

Supplier Due Diligence Processes for Slavery and Human Trafficking

We recognise the importance of maintaining both visibility and transparency within our supply chain in order to continue to protect those who work within it from potential abuse and exploitation to this end we take great care in selecting companies who supply us.

The Company undertakes due diligence when selecting new suppliers through:

- A contractor/supplier authorisation and approval process, which incorporates the utilisation of the supplier risk matrix to evaluate the risk of each provider.
- All new suppliers/contractors' complete questionnaires to ensure that they meet the Modern Slavery & Human Trafficking Act before being onboarded.
- An annual supplier audit programme, which includes Modern Slavery and Human Trafficking questions and/or statements.

In the next 12 months we will continue to strengthen our approach to managing the risk of Modern Slavery within our organisation to ensure our statement is responsive with our growing business by:

- Annual review of Procurement Policy & Procurement Quality Management Documents across our wider Group
- Continuously review Contractor and Supplier arrangements to establish risk of Contractors and Suppliers within the wider Group
- Regular consolidation of Contractor and Supplier list held on the Groups financial systems to ensure we only hold approved Contractors/Suppliers

Key Performance Indicators

We will continually measure the success and performance of our Group with the following KPI's:

- All existing suppliers to sign up to our Supplier Code of Conduct



- All new suppliers to sign the Supplier Code of Conduct
- Colleagues to be provided with Modern Slavery Awareness Training
- A program of Supplier audits to be completed each financial year.

People Policies

We are committed to ensuring that our employees are subject to fair working practices and are treated with respect. The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing policy** - the Company encourages all its colleagues, customers, and other business partners to report any concerns related to its direct activities or its supply chains.
- **Code of Conduct** - The Code of Conduct sets down the actions and behavior expected of employees when representing the Company.
- **Grievance** – employees can raise any employment concerns informally or formally via the company's grievance policy. Grievance can be raised directly with the People Team if the employee is raising concerns about a manager.

As a service provider, Vertas Group Limited's largest resource is people and we have a robust Recruitment and New Starter procedure to allow us to perform rigorous employment checks to ensure employees have the right to work in the UK, have their own named bank account, collect at least 1 previous employment reference, and where required for the role they are security vetted and/or have DBS check. An employee is prevented from commencing employment with the company until such checks have been completed and cleared.

The dedicated in-house recruitment team manage compliance with the new starter procedure, and an employee is prevented from commencing employment with the company until all documentation and checks have been completed and cleared by the recruitment team.

Vertas Group Limited strictly prohibits the use of child labour in any part of our operations or supply chain and is committed to upholding international labour standards.

The Group Board of Directors acknowledge that the Group is complying with the Modern Slavery Act 2015 as far as is reasonably practicable by continually developing and reviewing our policies, procedures and supply chain risk assessment and audit activity to support our business growth.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorse this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name:	Ian Surtees, MBA, FIoD
Position:	CEO
Date:	April 2026
Signature:	