

## The Vita Group

Oldham Road · Middleton  
Manchester · M24 2DB · United Kingdom  
t: +44 (0)161 643 1133  
e: info@thevitagroup.com  
[www.thevitagroup.com](http://www.thevitagroup.com)



## Slavery, and Human Trafficking Statement for the Financial Year 2022

This statement sets out the steps the Company has taken during the financial year ending 31 December 2022 to ensure that slavery and human trafficking are 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. 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 that aims to promote good ethical, labour, health & safety and environmental standards in our own businesses and 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 14 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.

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 -annually during face-to-face meetings.

In 2021, Vita introduced a "know your supplier" programme which additionally requires self-certification compliance with Vita's policies which include the Supply Chain Responsibility Policy, Sustainable Procurement policy Vita's Slavery and Human Trafficking statement and Vita's Purchasing & Marketing Code of Ethics.

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.**

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

**2. Raw materials – certain products have a higher risk such as 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 also completes a Conflict Minerals Reporting Template (CMRT) for our customers to ensure the chain of custody is maintained.

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 practices within our supply chain.

**Ian Robb**

CEO The Vita Group