

Modern Slavery and Human Trafficking Statement

Introduction

VAX Limited (“VAX”) understands the risk of potential modern slavery related to its business, is committed and has taken some actions to prevent the risks in its own operations and supply chain. This statement relates to actions and activities during the financial year 2020.

The codes and policies referenced in this statement can be found on our parent company’s website via:

<https://www.ttigroup.com/our-company/about-tti/our-policies/>

Relevant Policies

VAX has developed and implemented policies and practices that describe its approach to human rights and in particular to the prevention of modern slavery and human trafficking in its operations and supply chain. These policies are published on our parent company’s website and can be accessed via the link in the Introduction section.

- **Complaint Resolution Policy:** The organization encourages its employees and Business partners to report any concerns. We have an independent third party to receive and process these reports on an anonymous basis.
- **Employee Code of Ethics & Business Conduct:** The code makes it clear to employees what are the actions and ethical behaviour expected.
- **Business Partner Code of Conduct:** The code sets VAX requirements and expectations and request all suppliers to acknowledge the code.
- **Conflict Minerals Policy:** This policy sets up the rules, standards and expectations that VAX and its suppliers must abide by to ensure that VAX and its suppliers must source four materials – Tin, Tungsten, Tantalum, and Gold (“3TG”) from reputable sources free from conflict or other human rights violations.
- **Policy Against Modern Slavery and Human Trafficking:** This policy sets further expectations in relation to human rights and modern slavery and provides a list of potential red flags as guidance to assist employees in identifying and rectifying the issues at early stage.
- **Cobalt Procurement Policy:** This policy sets up the rules, standards and expectations that VAX and its suppliers must abide by to ensure that VAX and its suppliers must source cobalt from reputable sources free from human rights violations.

Due Diligence

TTI Group performs due diligence when considering qualifying new suppliers and regularly reviews and audits its suppliers. The due diligence focuses on social, environmental requirements, ethical sourcing and modern slavery and human trafficking to ensure protection of internationally proclaimed human rights.

Our Policy Against Modern Slavery and Human Trafficking outlines the various steps taken by TTI Group to verify, investigate, audit and remedies as follows:

This statement has been published in accordance with the Modern Slavery Act 2015.

- Trainings of employees on Code of Conduct and relevant policies;
- Training and acknowledgement on the Business Partner Code of Conduct for and by suppliers;
- -Human trafficking and modern slavery provisions included in key supplier contracts;
- Acknowledgment on Policy Against Modern Slavery and Human Trafficking by our employees and suppliers;
- Declarations to be filled in for sourcing of Conflict Minerals and cobalt;
- Modern Slavery and Human Trafficking questionnaire to be completed by suppliers;
- Modern Slavery and Human Trafficking Risk Assessment conducted annually;
- Site visits and audits for high risk operations and suppliers; and
- Required corrective action plan for any discovered non-conformities.

Training

TTI Group requires all employees to complete the training on human rights, ethical trade and Policy Against Modern Slavery and Human Trafficking as part of the Employee Code of Ethics and Business Conduct training. Our supply chain and human resources employees will be trained to identify all red flags to prevent modern slavery in the supply chain.

Awareness

The Policy Against Modern Slavery and Human Trafficking has been communicated globally to all our employees.

Board Approval

This statement has been approved by the board of Vax Limited on 30th MARCH 2021.



David Winterbottom