

## 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 2019.

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 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.

- **Whistleblowing Policy:** The organization encourages its employees and Business partners to report any concerns.
- **Employee Code of 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 not source four materials – Tin, Tungsten, Tantalum, and Gold ("3TG") from the Democratic Republic of Congo ("DRC"), or its adjoining countries and provide guidelines for Vax employees and suppliers to assist them in establishing procedures to ensure that Vax sources 3TG from reputable sources free from conflict or other human rights violations.
- **Policy Against Slavery and Human Trafficking:** This policy sets further expectations in relation to human rights and modern slavery.
- **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 existing suppliers. The due diligence focuses on social and environmental requirements including ethical sourcing and anti-human trafficking.

Our Anti-Human Trafficking Policy outlines the various steps taken by TTI Group to verify, investigate and audit slavery and human trafficking:

- Certification of the Employee Code of Conduct by employees;

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

- Certification of the Business Partner Code of Conduct by suppliers;
- Anti-Human Trafficking and slavery provisions included in key supplier contracts;
- Acknowledgment on Policy Against Slavery and Human Trafficking by our employees and suppliers
- 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.
- Declarations to be filled in for Conflict Minerals and for cobalt.

### **Training**

TTI Group requires all employees to complete the training on human rights and ethical trade 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 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 13/5/2020 2020.



David Winterbottom