



# Anti-Slavery and Human Trafficking Policy

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## Executive Statement

The Metaverse-VR (MVR) Ltd Business Management System (BMS) and associated documentation define the principles and values underpinning the business and its approach to Quality and Information Security Management.

MVR Ltd is committed to providing high-quality products and services that meet or exceed the expectations of our customers. We strive to continuously improve our processes, systems, and services to enhance customer satisfaction and achieve excellence in all that we do. We are dedicated to complying with all applicable regulations and standards, such as ISO 9001:2015 and ISO 27001:2013, and to fostering a culture of quality throughout the organisation. Our employees are empowered and encouraged to contribute to the achievement of our quality objectives, and we provide the resources, training, and support necessary to ensure their success.

The BMS framework applies to all departments and all personnel working on behalf of the Company. All personnel are responsible for maintaining high quality and information security standards. Compliance and culture must be driven down from the board level. The BMS enables management oversight and the ability to monitor company efficiency via documented SMART objectives and KPI's. It also assures compliance with both external regulation and internal policy, as well as providing a mechanism for continuous improvement within the Company.

A handwritten signature in black ink, appearing to read 'Claire Jones'.

**Claire Jones**  
Chief Operating Officer, Metaverse-VR Ltd

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| Issue # | Date               | Changes             |
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| 1.0     | 15th August 2023   | Initial Issue       |
| 2.0     | 23rd November 2023 | Internal Review     |
| 3.0     | 10th January 2024  | Internal Review     |
| 4.0     | 20th January 2024  | Post Audit Response |

## Anti-Slavery and Human Trafficking Policy

### 1. Purpose

1.1. The purpose of this document is to set out the Company’s commitment to safeguard against the use of slavery and human trafficking in the Company’s business and within its supply chain. The Company expects that its suppliers will adopt the same level of commitment within their organisations and will hold their own suppliers to the same high standards as set out in this policy. This policy aims to improve transparency in keeping with the spirit and the principles of the Modern Slavery Act 2015<sup>1</sup>.

slavery, servitude, forced and compulsory labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited<sup>2</sup>. All forms of Modern Slavery have in common the deprivation of a person’s liberty in order to exploit them for commercial or personal gain.

2.3. The Company has a zero tolerance approach to Modern Slavery and is committed to acting ethically and with integrity in respect of all its business dealings and relationships. The prevention, detection and reporting of modern slavery and human trafficking in any part of the Company’s business or its supply chain is the responsibility of all Persons. The Company will implement and enforce effective systems and controls to prevent Modern Slavery taking place within its own business and shall take all reasonable steps to ensure that Modern Slavery is not present and does not occur within its supply chain. The prevention, detection and reporting of Modern Slavery is the responsibility of all Persons.

### 2. Scope

2.1. This policy applies to all of the Company’s employees, sub-contractors, agents, intermediaries and other third party representatives (“Persons”).

2.2. ‘Modern Slavery’ is a term used to encapsulate both offences in sections 1 and 2 of the Modern Slavery Act 2015. It is a crime and a violation of fundamental human rights and takes various forms which include but are not limited to

### 3. Compliance

- 3.1. The Company requires all Persons to gain a thorough understanding of what constitutes Modern Slavery and to uphold and support the following measures to protect against Modern Slavery:
  - 3.1.1. The Company shall, on a case-by-case basis and as part of its Supplier Approval Process, assess the requirement for and the extent of due diligence that should be carried out in relation to its supply chain, adopting a risk-based approach.
  - 3.1.2. The Company shall similarly adopt a risk-based approach to its contracting process assessing the level of anti-Modern Slavery provisions that need to be incorporated in the contract and keeping these under review.
  - 3.1.3. The Company shall engage with its supply chain to address any perceived risks of Modern
    1. It being acknowledged that the Company is not formally required to publish a Slavery and Human Trafficking Statement under Section 54 of the Modern Slavery Act 2015.
    2. Further information on what constitutes 'Modern Slavery' under the Modern Slavery Act 2015 can be found at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/649906/Transparency\\_in\\_Supply\\_Chains\\_A\\_Practical\\_Guide\\_2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf)
  - 3.1.4. Each Person, shall, where further required by the Company, respond promptly and in good faith to any reasonable requests by the Company for that Person to provide additional information to confirm compliance with this policy.

3.1.5. All Persons must report any suspected or actual (whether or not based on personal knowledge) instances of non-compliance or breach to the Company by following the Company's Whistle-blowing policy (INZ/PRO/049 Whistleblowing-Making a Disclosure).

3.2. If any Person is unsure about whether a particular act, the treatment of workers more generally (whether an adult or a child), or their working conditions within any tier of the Company, its own company, or the supply chain of the Company or its supply chain constitutes Modern Slavery the Modern Slavery Helpline can be contacted on 0800 0121700 for advice. However, unless the Person is absolutely certain a particular act, treatment of workers or their working conditions does not constitute Modern Slavery or human trafficking the Person should make a report in accordance with paragraph 3.1 above.

### 4. Communication and Awareness of this Policy

- 4.1. The Company shall communicate this policy to all Persons by (a) including it as part of its induction programme for new employees; (b) circulating it amongst existing employees; (c) providing it to all proposed third party sub-contractors, agents, intermediaries and other third party representatives as appropriate. Furthermore, the Company shall undertake regular reviews of the policy to reinforce its principles amongst all Persons and shall issue further communications and undertake further training as it deems appropriate as part of its ongoing due diligence process.

## 5. Breaches of this Policy

- 5.1. A breach of the provisions of Modern Slavery Act 2015 constitutes a criminal offence.
- 5.2. The Company shall take appropriate action if it discovers that any Person has breached this policy.
- 5.3. Breach of this policy by any employee may result in disciplinary action.
- 5.4. Breach of this policy by any Person other than an employee is likely to result in the termination of the Company's business relationship with that Person.

## 6. Forms

- 6.1. None

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