

Slavery, Human Trafficking and Sex Trafficking
Statement 2018

Purpose

VIRTUS recognises the importance of internal governance and associating ourselves with an ethical supply chain to provide the services offered. As part of a strategy to deliver quality services to our international client base, VIRTUS seeks to abolish slavery, human trafficking and sex trafficking within our area of influence to comply with Human Rights, Global/Local Labour Standards, The Palermo Protocol and The Modern Slavery Act 2015.

This statement is made on behalf of VIRTUS Holdco Limited and all its affiliated companies ('VIRTUS') in the United Kingdom pursuant to section 54(1) of the Modern Slavery Act 2015.

Affiliated Companies:

- VIRTUS Data Centres Properties Limited
- VIRTUS (Data Centres) Limited
- VDCM Limited
- VIRTUS IMH Limited
- VIRTUS IMH2 Limited
- VIRTUS (Enfield) LLP
- VIRTUS Enfield (Data Centres) Limited
- Enfield DC Service Company Limited
- VIRTUS Hayes Limited
- VIRTUS Slough Limited
- VIRTUS LONDON5 Limited
- VIRTUS LONDON6 Limited
- VIRTUS LONDON7 Limited
- VIRTUS LONDON8 Limited
- VIRTUS LONDON9 Limited
- VIRTUS LONDON10 Limited

This Statement details the controls (due diligence), effectiveness and training that VIRTUS has conducted during the financial year 1 January to 31 December 2018 in order to meet the conditions of The Modern Slavery Act 2015 and VIRTUS' own principles for the abolishment and prevention of slavery, human trafficking and sex trafficking instances.

VIRTUS Public				
Author:	<i>Daniel Burgon</i>	Release Date:	<i>28/02/2019</i>	
			Major Version	Minor Version
Approved:	<i>Neil Cresswell</i>	Document Control:	<i>1.</i>	<i>1</i>

Business and Supply Chain

VIRTUS is a London-centric limited organisation with a 50+ FTE staff base. VIRTUS is part of an international group of companies that has ST Telemedia Global Data Centres (STT GDC) as its principal entity.

VIRTUS' activities in the United Kingdom include the design, build and operation of data centres. As a leading London-based service provider, VIRTUS has a supply chain model that supports both data centre design & build and data centre operations. VIRTUS' supply chain relates mainly to the following activities:

- **Contracting** – the specialist contractors necessary to deliver certain construction, engineering and service operations on construction and operational sites;
- **Subcontracting** – the specialist subcontractors necessary to deliver certain construction, engineering and service operations on construction and operational sites;
- **Consultancy** - professional and consultancy services from design professionals in various fields, including, without limitation, engineering (such as architectural, mechanical and electrical services and process engineering), energy management, project management, cost consultancy and surveying;
- **Business services** – a wide range of products and services necessary to maintain normal day to day operations in its offices and support its operational business functions such as facilities management, cleaning, security, energy procurement and IT support services;
- **Professional services** – professional services such as external training, audit services and advisory services in areas such as tax, regulation, insurance and law.
- **Real estate** – the purchase or leasing of office space to accommodate staff and operate its business;
- **Technology** – the systems, software and equipment that are necessary to maintain the technology infrastructure that supports operational business functions.

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Controls

VIRTUS maintains (?) several controls which are either directly or indirectly relevant to preventing slavery, human trafficking and sex trafficking from occurring in its business functions or its supply chains:

Dedicated Compliance Function – VIRTUS has a dedicated compliance function ensuring that processes, policy and protocols are adhered to within all business functions and that supply chain evaluations are conducted.

VIRTUS Slavery, Human Trafficking and Sex Trafficking Policy – This policy specifically addresses the subject matter of the Modern Slavery Act 2015.

VIRTUS Compliance Policy – With a declaration to comply with all relevant and applicable law & legislation, VIRTUS seeks to ensure compliance to the Modern Slavery Act 2015, The Palermo Protocol, Human Rights and Global & Local Labour Standards.

VIRTUS Ethical Trading Policy – A standard of labour expected to be complied with by the VIRTUS supply chain.

VIRTUS Code of Conduct – A library of policies, guidelines and processes agreed to and accessible by all VIRTUS full-time employees and part-time employees, which covers elements such as whistleblowing, harassment, bullying, group ethics, employment guidelines, DBS, safeguarding etc.

VIRTUS Occupational Health & Safety Policy – VIRTUS' commitment and approach to providing and promoting a healthy and safe working environment

VIRTUS Procurement Policy and Procedures – Internal control and governance procedures around approving financial transactions and signing contracts.

Due Diligence – Detailed below.

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Due Diligence

Management

The VIRTUS Board of Directors ('the Board') is accountable for abolishing and preventing instances of slavery, human trafficking and sex trafficking within VIRTUS' business functions and sphere of influence where practicable.

The Board has delegated responsibility of oversight and monitoring of the effectiveness of the VIRTUS Slavery, Human Trafficking and Sex Trafficking Policy to the Compliance Business Function. The Compliance Manager has the power to make recommendations to the Board for the introduction or amendment of policies and practices to ensure VIRTUS' activities display the highest level of ethical conduct.

VIRTUS also employs professional law services to ensure compliance with its legal and ethical obligations.

Procurement

VIRTUS and its suppliers are expected to live up to and adhere to the principles set out in the 'VIRTUS Slavery, Human Trafficking and Sex Trafficking Policy' and the 'VIRTUS Ethical Trading Policy' and demonstrate progress towards the standards set out in them.

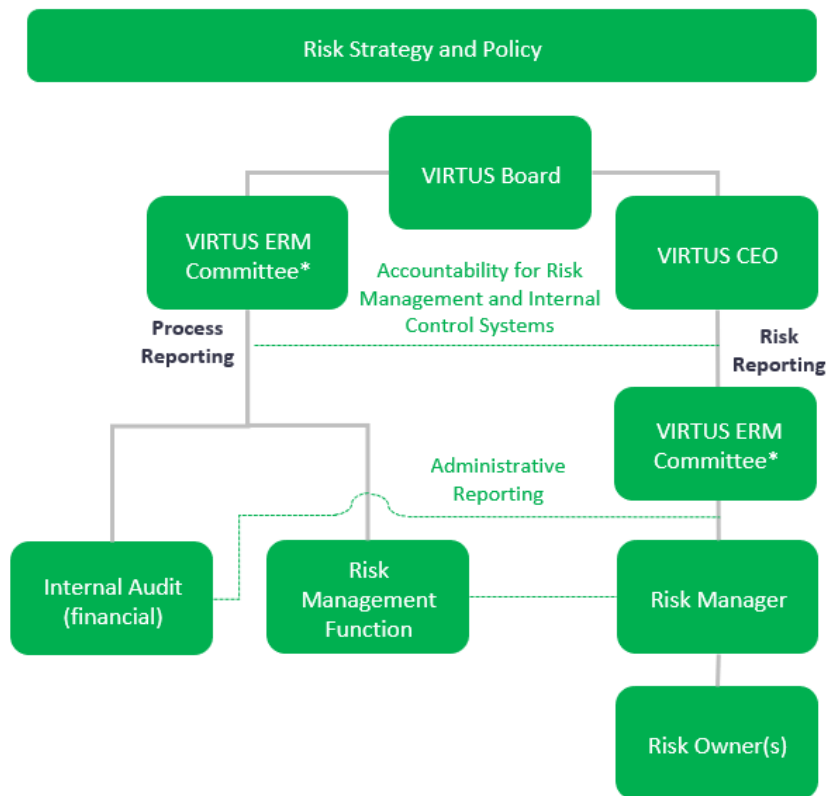
VIRTUS' procurement practices require that all new suppliers are subject to an appropriate level of screening. The scope of the screening performs depends on the nature of the goods or services being procured but can include financial checks, data security assessments, reference checks, obtaining copies of relevant documents and/or site inspections. All procurement practices are governed by the 'VIRTUS Procurement Policy & Procedures'.

Risk Assessment

Plausible instances of slavery, human trafficking and sex trafficking events are captured and evaluated in the VIRTUS Enterprise Risk Management System against pre-determined assessment criteria. The evaluation process involves assessing the effectiveness of implemented controls and identifying further gaps. It is the primary method the Compliance Manager can utilise to provide recommendations to the Board (with evaluated data).

Significant risks are escalated to the Board ensuring oversight and the capacity to enact top-down, informed business decisions.

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Supply Chain Evaluation

VIRTUS' supply chain companies are assessed against the requirements of The Modern Slavery Act 2015 by an annual supply chain questionnaire. Recorded questionnaire responses are evaluated by VIRTUS' Compliance Function. The process is conducted at least annually ensuring our supply chain remains vigilant and has applied adequate controls to ensure slavery, human trafficking or sex trafficking activities do not occur.

Sections of the VIRTUS Supply Chain Questionnaire that are directly relevant to the control:

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2. Supply Chain Ethical Requirements

	Link to Legislation	Compliant	Non Compliant	Not Applicable
a. If your company (incorporated or partnership) conducts business, or part of a business, in the UK, has a annual turnover equal to or greater than £36 million and supplies goods or services please attach your annual Modern Slavery Act Position Statement (to include; Policy Document, Description of the Business, Supply Chain Assessment Results and Methodology and Internal Governance Methodology).	Modern Slavery Act (2015)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Please indicate level of compliance to:	Working Time Regulations (1998)	<input type="checkbox"/>	<input type="checkbox"/>	
c. Please indicate level of compliance to:	Right to Work	<input type="checkbox"/>	<input type="checkbox"/>	
d. Please indicate level of compliance to:	National Minimum Wage and National Living Wage	<input type="checkbox"/>	<input type="checkbox"/>	
e. Please indicate level of compliance to:	Ethical Trading Initiative (ETI) Base Code	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Please indicate level of compliance to:	Bribery Act (2010)	<input type="checkbox"/>	<input type="checkbox"/>	
g. Please indicate level of compliance to:	The Public Interest Disclosure Act 1998	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Please indicate level of compliance to:	Chartered Institute of Procurement & Supply (CIPS) Corporate Code of Ethics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Please indicate level of compliance to:	CICM Prompt Payment Code	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Has your company ever been subject to a regulatory investigation? If so, please provide details of any known or perceived and/or potential conflict of interest	YES <input type="checkbox"/>	NO <input type="checkbox"/>		
k. With specific regards to relationship continuity, please detail how your company promotes staff engagement and staff retention. Where possible, please provide retention policies, promotion policies, and staff appraisal processes.				

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5. Supply Chain General & Governance Requirements

	Link to Legislation	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
e. Does your organisation have fraud prevention measures in place to prevent the facilitation of tax evasion?	Criminal Finances Act 2017	<input type="checkbox"/>	<input type="checkbox"/>	
f. Does your organisation have and maintain a whistle-blowing policy?		<input type="checkbox"/>	<input type="checkbox"/>	
g. In the past 2 years, has your organisation submitted Suspicious Activity Reports (SARs) directly associated with your organisation to the National Crime Agency (NCA)?	National Crime Agency	<input type="checkbox"/>	<input type="checkbox"/>	
h. In the past 2 years, has your organisation submitted Suspicious Activity Reports (SARs) indirectly associated with your organisation (contractors, third parties etc.) to the National Crime Agency (NCA)?	National Crime Agency	<input type="checkbox"/>	<input type="checkbox"/>	
i. Have you read, and do you agree to, the content of each policy found in the VIRTUS Data Centres online policy library?	https://virtusdatacentres.com/general/virtus-policies	<input type="checkbox"/>	<input type="checkbox"/>	

Employment

VIRTUS strictly adhere to the following conventions ensuring the protection and welfare of our employees:

- Contracts of Employment
- Occupational Health & Safety
- Wage Regulation
- Working Time Regulation
- Occupational Pensions
- Code of Conduct

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Effectiveness

VIRTUS have not found evidence of non-compliant practice internally or throughout the evaluated supply chain against any of the following

1. The Modern Slavery Act 2015
2. Controls
 - a. Dedicated Compliance Function
 - b. VIRTUS Slavery, Human Trafficking and Sex Trafficking Policy
 - c. VIRTUS Compliance Policy
 - d. VIRTUS Ethical Trading Policy
 - e. VIRTUS Code of Conduct
 - f. VIRTUS Occupational Health & Safety Policy
 - g. VIRTUS Procurement Policy and Procedures
 - h. Due Diligence

The VIRTUS Enterprise Risk Management System has not identified further action or non-conformance after quarterly evaluations of risks pertaining to slavery, human trafficking and sex trafficking.

VIRTUS have the necessary principles and processes to assist in decision making in the event of a breach of standards.

Training

All VIRTUS staff are subject to inductions, introducing them to all the relevant materials regarding slavery, human trafficking and sex trafficking. During induction, staff are required to acknowledge and agree to the principles stipulated in each policy. The Compliance Business Function is developing an enhance awareness program to fall in line with annual ISO training regimes to further support this internal control and to dovetail into impending 2019 CSR program.

External training comes in two forms;

- The public availability of the VIRTUS Slavery, Human Trafficking and Sex Trafficking Policy
- The annual VIRTUS Supply Chain Questionnaire communicates all relevant policies where VIRTUS require an approval of understanding and agreement to comply with the policy stipulates.

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Commitment

The statement is approved by the VIRTUS Holdco Limited Board.

VIRTUS are committed to continued compliance to The Modern Slavery Act 2015 and enhancing/improving controls where a gap/opportunity has been identified. VIRTUS are also committed to work with our supply chain to strengthen ethical relationships and to further communicate our principles for the abolishment and prevention of slavery, human trafficking and sex trafficking.

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Neil Cresswell
Chief Executive Officer, VIRTUS Holdco Limited.

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