VIVAR PRINTING SDN.BHD.

Human Resource Department

Anti – Slavery and Human Trafficking Policy



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Preface and document control
This document is intended to provide information in respect of VIVAR policy, procedure, standards or guidance and will be periodically updated to reflect any changes due to business requirements or infrastructure. This document MUST be reviewed and approved by Managing Director to ensure technical accuracy and business validity.

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Owner	HR
Approver(s)	HR Director

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Anti-Slavery and Human Trafficking Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, agents, contractors and suppliers.

Vivar prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

Commitments

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child 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. Modern slavery is a crime and a violation of fundamental human rights.

Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risked based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:
  - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code

- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.

- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Compliance

Anyone working on the company's behalf in any capacity, including employees at all levels, directors, officers, agency workers, interns, agents, contractors, external consultants, third party representative and suppliers must read, understand comply with this policy.

The prevention, detection, and reporting of modern slavery in any part of the company's businesses and supply chains is the responsibility of all those working for it or under its control. Those working on the company's behalf are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

You must notify the Management of the company or the Human Resources Department as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future. Staff are encouraged to raise concerns about any modern slavery likely in any parts of company's supply chains in any supplier tier at the earliest possible stage.

Reporting

Internal reporting is critical to the company's success, and it is both expected and valued. You are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that you become aware of.
Complaints will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a complaint made in "good faith".

If a member of staff believes that a breach that they have suffered any such treatment, they should inform the HR Department immediately.

Communication and Awareness of this Policy

Training on this policy and on the risk our business faces from modern slavery in its supply chains will be provided annually (and as otherwise necessary).

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breach of this Policy

Any employee who breaches this Policy by engaging in or conspires to engage in any modern slavery conduct or human trafficking will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and if warranted legal proceedings may be brought against you.

The company may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this policy.

Declaration

We have received a copy of the Anti-Slavery and Human Trafficking Policy from Vivar Printing Sdn Bhd and hereby commit ourselves, in addition to our commitments set out in agreements with Vivar, to comply with its principles and requirements.

Acknowledged by:

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Name:
Company's Name: