

Modern Slavery Act 2015

Modern Slavery Act Statement 2017

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2017.

This statement applies to Volvere plc and its trading subsidiaries as at 31 December 2017.

About Volvere's structure and business

Volvere plc is a United Kingdom-based holding company of a group of companies (the "Group") operating in the automotive consulting, food manufacturing and security solutions sectors (all as at 31 December 2017). Further information on the Group's segments and activities is set out in the Group's annual report and accounts. The automotive consulting segment was disposed of in October 2018.

Our commitment and policies

The Group is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or any part of its Group businesses and operates a zero-tolerance policy in this regard.

Whilst we do not have a formal anti-slavery policy, we ensure that we, and endeavour to ensure that our trading subsidiaries, operate in such a way so as to conduct business in a transparent and ethical manner. The nature and extent of the policies and procedures is entity-specific given the diverse nature of our and our subsidiaries' activities.

Supply chain

In relation to Group companies at 31 December 2017, the following statements apply to each company's supply chain:

Holding Company – Volvere plc: as a holding company, the supply chain is largely limited to financial services firms and providers of office-related services. Nearly all our suppliers are based in the United Kingdom and the company endeavours to use only reputable suppliers. Given the nature of the company's business, the risk of slavery or human trafficking within the company's supply chain is considered to be low.

Automotive Consulting – Impetus Automotive Limited: as a consultancy business, the supply chain is largely limited to financial services firms, providers of office-related services and independent consultants/service delivery partners. Whilst most suppliers are based in the United Kingdom, the company has a number of offices and service partners in certain foreign countries. At all times the company endeavours to use only reputable suppliers. Given the nature of the company's business, the risk of slavery or human trafficking within the company's supply chain is considered to be low. This company was sold in October 2018.

Food Manufacturing – Shire Foods Limited: as a UK-based food manufacturing business, the company sources raw materials from a number of different suppliers who are predominantly based in the United Kingdom. However, ingredients' countries of origin may be outside the United Kingdom. Shire has adopted key aspects of the Ethical Trading Initiative Base Code, which are reflected in Shire's internal policies and procedures.

As part of Shire's supplier approval processes, potential suppliers who are required to make a Modern Slavery Statement are confirmed as having done so. Given the nature of the company's internal controls and use of reputable suppliers, the risk of slavery or human trafficking within the company's supply chain is considered to be low.

Security Solutions – Sira Defence and Security Limited: as a software solutions provider, the company's supply chain is limited to financial services firms and independent consultants. All suppliers are based in the United Kingdom and the company endeavours to use only reputable suppliers. Given the nature of the company's business, the risk of slavery or human trafficking within the company's supply chain is considered to be low.

Ongoing monitoring

If issues are identified in relation to modern slavery, these will be dealt with by the board of the relevant trading subsidiary.

The statement was approved by Volvere plc's board of directors on 7 March 2019 and will be reviewed annually.

Nicholas Lander
Company Secretary
7 March 2019