



## MODERN SLAVERY STATEMENT

2022

Sir Richard Branson, the Branson family and the Virgin Group support the global fight against labour abuse and modern slavery in business operations and supply chains and are vocal supporters of social and environmental justice issues.

The Modern Slavery Act 2015 defines “slavery and human trafficking” as the offences of “slavery, servitude and forced or compulsory labour” and “human trafficking”, which together constitute “modern slavery”. Given modern slavery is one of the worst forms of human rights abuses in supply chains, for this transparency statement, the term should be taken in its widest context to include wider human rights abuse that can create environments where modern slavery can thrive, such as other forms of labour and worker exploitation.

Virgin has a zero-tolerance position towards modern slavery and human trafficking in all forms. Modern slavery is wholly incompatible with our ethics and the general standards of integrity expected of all our employees and those who work with us. As well as working to prevent modern slavery in our business operations and supply chain, we use the platform that the Virgin brand provides to promote human rights around the world.

#### ***Companies covered by this statement***

*This transparency statement has been published in accordance with the Modern Slavery Act 2015 (the "Modern Slavery Act") for the 2022 financial year end and provides information about the business and supply chains of Virgin, as defined in the paragraph below. Virgin Holdings Limited, Virgin Management Limited and Virgin Enterprises Limited are required to report under the Modern Slavery Act 2015. The other Virgin entities who are reporting in this statement do so voluntarily.*

*This statement is made on behalf of (1) Virgin Holdings Limited (VHL), as well as the following of its group undertakings: (2) Virgin Management Limited (VML), (3) Virgin Enterprises Limited (VEL), (4) VM Advisory Limited (VMAD), (VHL, VML, VEL and VMAD together being the “Virgin Management Companies”), (5) Virgin StartUp Limited, and additionally (6) The Virgin Foundation (Virgin Unite), (all together hereafter referred to as “Virgin”, “we”, “our”<sup>1</sup>).*

*The ultimate parent company of VHL is Virgin Group Holdings Limited, which is a company incorporated in the British Virgin Islands and wholly owned by Sir Richard Branson.*

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<sup>1</sup> For the avoidance of doubt, all other Virgin branded businesses, which are separately governed and operated entities, such as Virgin Red, Virgin Money and Virgin Atlantic, are responsible for their own approaches to tackling modern slavery. Should you wish to see the Modern Slavery Act statements for other Virgin branded companies, please go to their respective websites.

# Who we are and what we do

The Virgin Management Companies are the home of Virgin, supporting the Branson family and growth of the Virgin brand by developing and nurturing valuable Virgin businesses.

At Virgin, we create unique customer experiences, challenge the status quo and champion climate, people, and nature. For more than five decades, in six business sectors and on five continents, our purpose has been to change business for good. We define success not only by building successful, profitable businesses as global employers but also by the long-term value we create. This is underpinned by our four purpose pillars where we aim to have impact: Flourishing People, Thriving Communities, A Healthy Planet For All and Radical Collaboration.

The Virgin branded businesses span multiple sectors: Travel & Leisure, Health & Wellness, Music & Entertainment, Telecoms & Media, Financial Services and Space. The strength, diversification and maturity of our portfolio enables the Virgin Group to realise certain holdings, reinvesting profits and proceeds from sales to support, develop, and grow new and existing businesses.

Whilst the Virgin branded businesses operate across the globe and in multiple jurisdictions, the Virgin Management Companies are headquartered in London, alongside Virgin StartUp Limited, which provides government-backed loans and other support to entrepreneurs, and Virgin Unite, the Group's independent non-profit foundation uniting people and entrepreneurial ideas to create opportunities for a better world.

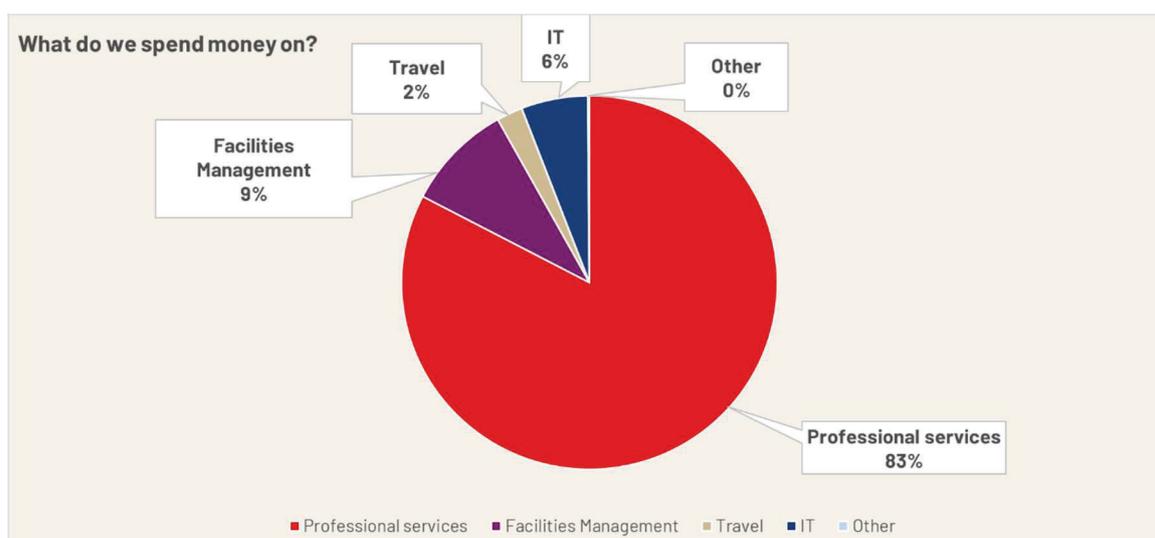
Virgin Management and Virgin StartUp joined an important coalition of like-minded businesses by signing the *Better Business Act* (BBA) in 2021. The BBA is transforming the way we do business so that every single company in the UK, whether big or small, takes ownership of its social and environmental impact. The BBA is making a straightforward ask of the government: change Section 172 of the Companies Act to ensure that company directors are responsible for advancing the interests of shareholders alongside those of wider society and the environment. This small but crucial change to company law will ensure that all businesses in the UK have a legal obligation to do the right thing for their people, the communities they serve and our wonderful planet. One of the initiatives we have launched as a result of signing the BBA is a Purpose Decision Making Filter. More information relating to the filter can be found under the "Our Policies" section.

# Understanding our business

## Procurement Spend

Our operations are primarily based in two offices – one in the United Kingdom and one in the United States. At 31st December 2022, we had a total of 208 employees – 86% in the UK, 13% in the USA and the remaining 1% elsewhere <sup>2</sup>.

### Procurement spend in 2022:



In 2022 we analysed our procurement spend by category to help identify risks in our supply chain. As of the date of this statement, our procurement categories have not changed materially, nor flagged material risks over the last 12 months. The bulk of our procurement spend is on third party services to support our business, including legal firms, consultancies, brand and marketing agencies, IT support, HR services, facilities and travel. We also procure a limited selection of goods including office furniture, food and beverages for our offices and IT equipment. 83% of our spend was on professional services including advisers and consultants, all of whom passed our internal due diligence processes and were deemed low in risk in terms of modern slavery. A further 9% was on facilities suppliers – primarily catering and telecommunications; 6% on IT and 2% on travel. Other categories accounted for less than 1% of our total spend for 2022.

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<sup>2</sup> Unless otherwise specified, statistics contained herein cover the Virgin entities who are reporting in this statement and related Virgin management companies; as referred to on Page 1 of this statement.

## Our investments and brand licensing

As a responsible investor we are committed to ensuring the companies we invest in and/or license the Virgin brand to are making sure that slavery and human trafficking does not exist in any part of their businesses or supply chains. While the businesses that Virgin invests in and/or licenses its brand to are responsible for their own corporate governance processes, we endeavour to use our relationships with these entities to emphasise the importance of preventing modern slavery in their own operations and supply chains. We met with the majority of our operating companies at least twice a quarter during 2022, to discuss amongst other topics, sustainability and ESG, including modern slavery.

VML has internal teams dedicated to proactively supporting the companies, in which Virgin invests or to which it licenses its brand, with managing the social and environmental risks in their own supply chains, including risks relating to slavery and human trafficking. Examples of activities carried out by VML in 2022, to ensure best practice to eradicate modern slavery is embedded among these companies include:

- Supporting the development of anti-modern slavery processes for companies situated in territories at higher risk of modern slavery abuses.
- Supporting those companies required to report under the UK Modern Slavery Act to review their compliance, offering support where necessary in developing their modern slavery policies and processes.
- Running forums with companies on the issue of modern slavery, with participation by companies' Sustainability and Safeguarding leads and Marketing and People Team leads.
- Ensuring that we share our modern slavery guidance and our expectations of companies in relation to anti-modern slavery practices.
- Sharing best practice with operating companies, to remain informed of modern slavery rules and global news.

# Our policies

Our ambition is to work to the highest possible standards of ethical conduct, and we expect the same from our people and the people and companies we work with to ensure that we are a responsible business. Our ways of working and ethics are reflected in our organization policies and procedures.

We have four key policies which are relevant to how we address our zero-tolerance commitment to modern slavery:

1. Anti-slavery Policy
2. Supplier Code of Conduct
3. Know Your Partner Policy
4. Whistleblower Policy

In addition to our policies, we also introduced a new purpose decision making tool during 2022 on the back of signing the BBA which helps all our teams to make more purpose driven decisions every day in their role. Our **Purpose Decision Making Filter** is used as an onboarding and ethical due diligence tool alongside our policies. It is designed to help ensure that strategic and business decisions are made in accordance with our Purpose vision and pillars - and is a tool to help us assess, discuss and evolve our thinking when it comes to Changing Business for Good. This further supports our updated Articles of Association and alignment with the Better Business Act. The filter has been designed to be flexible, to work for all stakeholders, and to be globally relevant across different markets, industries and partners. It considers decisions through specific environmental, social and governance criteria, alongside human rights and supply chain best practice guidance. In addition to embedding it across VML in 2022, we intend to share it across our Virgin businesses during 2023 & 2024.

Our **Anti-Slavery Policy** sets out our zero-tolerance stance on modern slavery and human trafficking. The policy provides our employees with guidance on how to identify and report slavery concerns, if necessary, using our separate **Whistleblowing Policy**.

Our **Know Your Partner Policy** sets out how we risk assess and conduct due diligence on new suppliers. This helps us evaluate potential risks associated with a supplier, for example whether the supplier (or a substantial part of their upstream supply chain) is in a country known for labour abuses or ESG risks.

Our **Supplier Code of Conduct** sets out the labour, social and environmental standards that we expect of our suppliers and their sub-contractors, subsidiaries and own

suppliers. The Supplier Code of Conduct states that suppliers are required to ensure there is no slavery, forced and child labour or human trafficking in their business or at any stage of their supply chain and those suppliers who manufacture products should meet the provisions of the Ethical Trading Initiative Base Code or similar standards.

We continue to incorporate evolving best practices and ensure our anti-modern slavery approach remains consistent with government guidance and market practice.

# Training and recruitment

## Training

Our employees receive a full induction upon joining, including training in a core curriculum of subjects such as modern slavery, anti-bribery and the Criminal Finances Act – with an assessment after the training to pass a core competence on the topics. Within the Modern Slavery training, we provide awareness of Modern Slavery and reporting mechanisms, in particular for areas of the business which require more bespoke training due to their level of involvement i.e., procurement, HR, Sustainability and those involved in escalation.

As at the end of 2022, 97% of our permanent employees had completed and passed an anti-slavery e-learning course, with those not completed re-enrolled for 2023. Additionally, we are in the process of rolling out refresher training for all our employees and for 2023 onwards, our target will be that 100% of our employees have completed and passed the anti-slavery e-learning course within the last two years. Our training includes content on identifying slavery in the supply chain and explains our internal reporting procedures.'

## Recruitment

We hold one-to-one interviews with all prospective employees, including temporary employees and contractors. The few recruitment agencies we use have all committed and confirmed to us that they adhere to the Modern Slavery Act.

## Due diligence

Due diligence is undertaken to ensure compliance with our policies detailed above and oversight of our policies continues to be the responsibility of VML's Chief Operating Officer and General Counsel.

In 2021, the charity Slave Free Alliance, conducted a gap analysis of our processes and procedures with regards to understanding our supply chain risks and identified a need for a central procurement function. We began the process of evolving our internal supplier onboarding team into a procurement team in 2022.

Recommendations from Slave Free Alliance in 2021 & 2022 progress:

No.	Recommendation	Progress
1	Develop a programme delivery team (Modern Slavery Working Group) to ensure sufficient resourcing and requisite skills to achieve the organisational aims and objectives.	Cross-matrix team of Advocacy, Purpose, Sustainability and Procurement convened to create an early framework to inform our 2023 updates to our Supplier Code of Conduct and Anti-slavery policies
2	Utilise the skills of a diverse working group to spread the efforts within the organisation and more effectively tackle the problem in hand. There is no formal procurement policy / process at this time. Consideration needs to be given to developing a policy to ensure consistency across all areas of procurement.	As above, the cross-matrix team worked together in 2022 to create a consistent procurement policy approach: the results of which will be shared in our 2023 report.
3	A review across the areas of business needs to be conducted to ensure that there is consistency in the delivery of the modern slavery programme throughout the organisation.	Ongoing but improvements already made through the cross-matrix team which works to a single approach to the modern slavery programme

## Onboarding and supplier selection

We continue to take a risk and materiality-based approach to due diligence. For our business, the risk of modern slavery or human trafficking sits predominantly in our supply chain.

Our general supply chain response (see below) applies to all suppliers, regardless of jurisdiction or location of operation. In addition, those identified as at higher risk of modern slavery (whether through procurement category, country of operation or volume of spend) are subject to further due diligence and remediation action plans.

## General supply chain response

All current and new suppliers are issued with our **Supplier Code of Conduct** and requested to comply with it. The suppliers are also assessed against our **Purpose Filter** guidelines which includes Diversity, Equality and Inclusion, Sustainability and Human Rights criteria.

The completed Purpose filter forms are sent to the Purpose and Sustainability teams, for a due diligence review ahead of a decision being taken.

When entering into an agreement with new suppliers or renewing contracts with existing suppliers, we conduct a due diligence exercise and undertake a risk assessment of that supplier in a manner outlined by our **Know Your Partner Policy**.

We actively look to impose contractual commitments on material suppliers requiring them both to comply with applicable law, specifically including the Modern Slavery Act, and to comply with our **Supplier Code of Conduct**.

## Higher risk supply chain response

In addition to our general supply chain response, our high category risk and high spend suppliers are subjected to greater scrutiny.

Where a potentially high-risk supplier is identified through the supplier setup process, we liaise with the procuring manager to identify any risk and provide appropriate deeper due diligence to assess the level of risk and mitigate that risk in conjunction with the supplier. This more tailored approach affords us the opportunity to learn about the supplier and nature of products or services to be bought, and accordingly identify whether this does indeed present an elevated risk of modern slavery.

We require all high-risk suppliers to share with us their sustainability policies and seek to address and understand their compliance with the following:

- Modern slavery statement requirements
- Paying a real living wage
- Diversity of management (we define a diverse supplier as a business owned and managed at least 51% by women, ethnic minority groups, disabled people, or members of the LGBT+ community)
- An approved diversity and inclusion strategy and/or an executive level position holder who is accountable for equality and diversity; as well as social impact
- Suppliers that have a process in place for identifying, assessing, and responding to social-related risks and opportunities.

In February 2022, Russia was sanctioned by the UK and USA for its invasion of Ukraine. As such, we have adopted a due diligence process, using our Purpose Filter, to ensure that our supply chains do not procure from any Russian company or government entity.

### Mitigating risk from high-risk procurement categories

In 2022, we worked with Slave Free Alliance, to assess our processes and ensure our modern slavery due diligence aligns with best practice. We used the CDP questionnaire to periodically assess the risk of modern slavery and human trafficking with select high spend suppliers.

## Priorities for the future

Our restless spirit at Virgin means that we are always looking to improve our processes and policies. In 2022, the Advocacy, Sustainability, Purpose and Procurement teams worked closely together to identify key areas to continue to progress, in relation to tackling modern slavery.

These include:

- Reviewing and, where appropriate, implementing the recommendations of the Slave Free Alliance gap analysis (conducted in 2021 and we will continue to implement recommendations into 2023)
- Developing a modern slavery e-learning refresher course for employees
- reviewing our approach to strategic supplier engagement, including with respect to modern slavery
- Engage with external suppliers on best practice supply chain risk analysis
- Continuing to support and encourage the businesses we invest in and licensees to mitigate the risk of modern slavery and human trafficking in their own operations and supply chains.
- Sharing best practice internally with our teams to understand that Modern Slavery is everyone's responsibility
- Social audits of our supply chains

We will update against these initiatives in our 2023 Modern Slavery Statement.

# Our broader contribution to securing human rights for all

The Branson family and Virgin also make a broader contribution to tackling modern slavery and securing human rights for all. Sir Richard Branson uses his considerable platform to raise awareness of modern slavery and to advocate for action to tackle it.

## The B Team

In 2013, Sir Richard Branson and Jochen Zeitz worked with Virgin Unite to create the non-profit organisation The B Team, which the Branson family and Virgin Unite continue to support. The B Team's global collective of business and civil society leaders are working together to build a better way of doing business that benefits humanity and the planet.

## The Elders

Virgin Unite also incubated the non-profit organisation The Elders, founded by Nelson Mandela and Graça Machel, uniting independent global leaders working together for peace and human rights. Modern slavery is one of the priorities the organisation addresses within its 'access to justice' focus.

Virgin Unite continues to support The Elders, and Sir Richard Branson and Jean Oelwang (President of Virgin Unite) sit on the organisation's Advisory Council. More information about The Elders is at [www.theelders.org](http://www.theelders.org).

Our advocacy work is communicated to employees through a range of communication channels and events. The clear focus on human rights in our advocacy and philanthropy, together with our company purpose of changing business for good, supports our efforts to ensure respect for human rights and zero tolerance of modern slavery is embedded throughout the organisation.

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes Virgin's slavery and human trafficking statement for the financial year ending 31 December 2022.

<p>DocuSigned by: <i>Ian Woods</i> FE591395EC2E432...</p>	<p><b>Ian Woods, Director</b></p> <p>Virgin Holdings Limited Virgin Management Limited VM Advisory Limited</p> <p>This statement was approved by the boards of these entities on 19 June 2023</p>
<p>DocuSigned by: <i>Andrew Swaffield</i> EEF5EDE18FA7435...</p>	<p><b>Andrew Swaffield, Director</b></p> <p>Virgin Enterprises Limited</p> <p>This statement was approved by the board of this entity on 19 June 2023</p>
<p>DocuSigned by: <i>Andrew Fishburn</i> 585791A165EE42E...</p>	<p><b>Andrew Fishburn, Director</b></p> <p>Virgin Start Up Limited</p> <p>This statement was approved by the board of this entity on 19 June 2023</p>
<p>DocuSigned by: <i>Holly Branson</i> 7471582E0ECF498...</p>	<p><b>Holly Branson, Director</b></p> <p>The Virgin Foundation</p> <p>This statement was approved by the board of this entity on 26 June 2023</p>