



UK Modern Slavery Transparency Statement

FY 2025



2025 UK Modern Slavery Transparency Statement

Introduction

This statement is made on behalf of Vialto Partners by CD&R Galaxy UK Opco Limited ("Vialto"), in respect of actions and activities carried out during the financial year ending 30 June 2025 (FY25), pursuant to section 54 of the Modern Slavery Act 2015 (the "Act").

Vialto maintains a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and ensuring that effective systems and controls are in place to prevent human rights abuses within our business and supply chains.

Our approach is informed by internationally recognised human rights standards and guidance, which shape our policies, due diligence processes, and risk management practices.

Our Structure and Supply Chain

Vialto is a global mobility business with a presence in more than 50 countries, operating across over 150 countries and territories, and employing ~7,000 professionals worldwide. Vialto's UK-based operating entity, CD&R Galaxy UK Opco Limited ("Vialto UK"), is regulated by the Solicitors Regulatory Authority and is subject to the provisions of the Act.

The network includes both Vialto UK-owned companies and independent, locally owned firms. All entities operate under the Vialto Partners brand and collaborate to deliver consistent, high-quality services. While adapting to local regulations, entities are guided by shared global policies and standards.

Vialto provides immigration, tax, and mobility consulting services to multinational clients, including global tax, immigration and business travel compliance, compensation and payroll, and remote-work solutions supported by analytics and mobility technology. Our services are delivered in collaboration with alliance partners such as relocation companies, payroll providers, assignment-management systems, business-travel platforms, and core HR and finance vendors.

To support these operations, we work with a global supply base of more than 3,000 suppliers and a trusted Third-Party Network (TPN) that extends our reach into jurisdictions where Vialto does not have a legal entity or local office.

Due Diligence and Risk Management

Vialto's due diligence and risk management processes are managed by the Global Legal, Risk and Compliance (LRC) team in partnership with the Procurement Team. While the overall risk of modern slavery within our professional services business is considered low, we recognise that risks can vary across our supply chain.

We take a risk-based approach to supplier due diligence, considering factors such as sector, geography, and supplier type. Higher-risk suppliers are subject to enhanced due diligence, which may include internal escalation, additional policy reviews, contractual requirements, or ongoing monitoring. This approach allows us to focus resources on areas of greatest exposure while maintaining proportionate oversight across our supply base.

Our due diligence process includes:

- **Supplier due diligence during onboarding:** New suppliers are screened through our supplier due diligence platform and are required to either adhere to our Global Third-Party Code of Conduct (TPCoC), which prohibits modern slavery, or to provide their own Code of Conduct that demonstrably addresses equivalent modern slavery and related human rights standards.
- **Contractual safeguards:** Our supplier agreements include requirements to comply with our TPCoC and applicable laws and regulations.
- **Ongoing monitoring:** We use sanctions and adverse media screening, whistleblowing reports, and supplier reviews to identify potential issues.
- **Remediation and response:** Concerns identified through due diligence, monitoring, or the Ethics Whistleblower Helpline are reviewed by the LRC team. Where potential issues are confirmed, we engage with the supplier to conduct investigations, implement corrective actions, and undertake root cause analysis to prevent recurrence.

Policies & Training

Our policies provide the framework for protecting human rights and ensuring safe, fair working conditions across our business and supply chains. They explicitly prohibit all forms of modern slavery, including forced, bonded, or child labour and human trafficking. These requirements apply to employees, contractors, suppliers, third parties, and affiliates.

In addition to various internal policies, Vialto's public policies addressing modern slavery are available on our website:

- Human Rights and Modern Slavery Policy
- Global Code of Conduct
- Global Third-Party Code of Conduct

We promote a strong speak-up culture through our confidential Ethics Whistleblower Helpline, which enables employees, clients, suppliers, and third parties to report concerns about potential human rights violations or modern slavery. Reports can be made anonymously online or via mobile:

- Web: <https://vialtopartners.ethicspoint.com>
- Mobile: vialtopartnersmobile.ethicspoint.com

To support the implementation of these policies, all Vialto employees complete mandatory annual Modern Slavery training. This training covers how to identify potential signs of exploitation, apply Vialto's policies and standards in practice, and raise or escalate concerns through appropriate channels.

Effectiveness, Governance & Continuous Improvement

At Vialto, we regularly assess the effectiveness of our approach to identifying and preventing modern slavery across our operations and supply chains. The following key performance indicators are used to evaluate how well our policies and processes are working in practice:

- **Training and awareness:** In FY25, 98% of employees completed modern slavery training, and 100% of new joiners completed training as part of their onboarding. As part of this process, employees also acknowledge key policies, including our Human Rights and Modern Slavery Policy and Global Code of Conduct.
- **Reporting and escalation:** During the reporting period, no concerns related to modern slavery were raised through our Ethics Whistleblower Helpline or other internal reporting channels.

- **Supplier engagement:** Of Vialto's suppliers and TPN affiliates registered on our supplier due diligence platform, 96% have agreed to comply with our TPCoC, which explicitly prohibits modern slavery. The remaining 4% provided their own Codes of Conduct, which were reviewed to confirm they address equivalent modern slavery provisions.
- **Enhanced due diligence:** Approximately 1.7% of suppliers underwent enhanced due diligence based on sector, geography, or supplier type.

We recognise that ongoing monitoring and refinement of our processes are essential to maintaining the effectiveness of our controls and mitigation of the risk of modern slavery. In FY26 and beyond, Vialto will continue to strengthen supplier oversight and will report on our progress annually as part of its Modern Slavery Statement.

Governance Statement

During the FY25 reporting period, no confirmed instances of modern slavery or human trafficking were identified within our operations or supply chain. We remain vigilant and committed to strengthening our approach year on year.

This statement covers the financial year ending 30 June 2025 and was approved by the Board of CD&R Galaxy UK Opco Limited on 11 November 2025 in accordance with section 54(1) of the Modern Slavery Act 2015.



Leonardo Palazzuoli
Director

Date: 20 November 2025