



UK Modern Slavery Transparency Statement

July 2024



UK Modern Slavery and Human Trafficking Transparency Statement

Introduction

Vialto Partners (“Vialto”) is committed to improving our practices to combat slavery and human trafficking in our business and supply chains.

At Vialto we continuously strive to enhance our commitment to safeguarding human rights and promoting decent working conditions. We recognize the significance of maintaining a safe and secure working environment, both within our own organization and throughout our supply chain. Our dedication to these principles is reflected in our policies and due diligence practices. Working collaboratively with our suppliers and business partners, we actively promote transparency across our global supply chain. This initiative serves not only to honor our commitment to respecting human rights and upholding the dignity of all individuals but also to fortify the foundations of our business. By fostering transparency, we enhance the resilience of our supply chain, and minimize risks. Vialto seeks to act in accordance with internationally-recognised human rights and standards, including the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles on Business and Human Rights, making them integral to the way we operate. As such, we have prepared this statement to fulfill these obligations and outline our efforts to address human rights impacts during the specified financial year (July 1, 2023 - June 30, 2024). Through our ongoing endeavors, we aim to continuously improve our practices and uphold the values we hold dear. We remain dedicated to creating a better and more sustainable future, not only for our organization but for all individuals impacted by our operations.

Organization’s Structure

Vialto is a newly formed global mobility company that is located in 50+ countries, operates in over 150 countries and territories and employs more than 6,500 global experts.

Vialto Partners is a trademark of CD&R Galaxy UK Opco Limited (Vialto UK) headquartered at 3 More London Riverside, London, SE1 2AQ, United Kingdom under which the Vialto entities operate and provide professional services. Collectively, Vialto UK and these other Vialto entities comprise the Vialto Partners network. “Vialto Partners”, depending on context, may refer to the Vialto Partners network as a collective or to individual Vialto entities.

Entities within the network leverage the Vialto Partners name, access network resources, and adhere to global policies while taking local regulatory requirements into account. They maintain the prescribed standards of the Vialto Partners network, ensuring a consistent approach across all entities. For these reasons, the Vialto Partners network consists of both legal entities wholly owned by Vialto UK, similar to the structure of a multinational company, as well as separate, locally owned legal entities. The entities that make up the network are committed to working together to provide quality service offerings for clients throughout the world.

Focusing on key areas such as strategy, brand, and risk and quality, Vialto’s management team develops and implements policies and initiatives to achieve a common and coordinated approach among individual entities where appropriate.


List of subsidiaries and independent entities can be found here <https://vialtopartners.com/disclosures>.


Our Business

Vialto's mobility experts help businesses with global tax, immigration and business travel compliance, compensation, payroll, and remote work, with analytics, insights, and mobility solutions. The services provided by Vialto are not seasonal.

Vialto's alliance network includes relocation companies, payroll providers, assignment management systems, business travel systems, and core HR and finance platforms. Vialto is the only global mobility provider who can offer the unrestricted breadth and depth of alliance coverage with fully integrated technology APIs.


Vialto's global mobility solutions include:






Tax

We simplify and streamline tax planning and compliance—so you can focus on your core business.




Immigration

With Immigration services in 150+ locations, we help people move quickly and compliantly across borders.




Business travel

We help get your people where they need to go. With automated processes, risk assessment, and compliance support, we can optimize travel and control costs.




Remote work

Whether your employees work from home or the office—or anywhere else in the world—our expertise and tools keep you connected and compliant.




Compensation and rewards

Our integrated, end-to-end payroll and rewards processes ensure holistic global reporting, local compliance, and overall cost-effectiveness.



Managed services

From day-to-day management to structural change, we help you design and implement thoughtful mobility strategies that adapt in real time.



Social security

Whether you're looking for practical solutions for social security compliance or proactive optimization for potential cost reduction, we're here to help.

Our Supply Chain

Our supply chains relate to our global-based professional services business, where we employ our people to provide services, expertise and advice to our clients. Our suppliers can include temporary staff, agency contractors, consultants, independent contractors, catering, event companies, legal services, among others.

Policies

Vialto is committed to sustainability and responsible business conduct in everything we do across our global operations and supply chain. An important part of that commitment is safeguarding fundamental human rights, including labor rights and ensuring decent working conditions, which are key elements embedded in all of Vialto's business operations, across the Vialto network and supply chain worldwide through our Anti-Discrimination, Anti-Harassment, and Anti-Bullying Policy, Diversity Equity and Inclusion Policy, [Human Rights and Modern Slavery Policy](#), Reporting Concerns Policy, [Global Code of Conduct](#), and [Global Third Party Code of Conduct](#). These standards address a broad range of fundamental human rights, labor rights and workplace health and safety safeguards in our global operations and supply chain to ensure fairness, ethical behaviour, dignity, and respect. Vialto's policies are regularly reviewed and revised to ensure they remain current and appropriate. These standards are endorsed by Vialto's Chairman and Chief Executive Officer and reinforced through various internal and external communication channels. This commitment is assured through governance and risk management processes, which are designed and applied to identify, assess, and mitigate potential adverse social and environmental impacts of our operations and supply chain and to monitor adherence to Vialto's core values.

Our Legal, Risk and Compliance team and Human Resources will review the Human Trafficking and Modern Slavery Policy and the Global Codes of Conduct on an annual basis with respect to their relevance and effectiveness and will make improvements as necessary. The policy and the Codes of Conduct are accessible to all employees via the Vialto Intranet, and to other external parties via the Vialto Partners website (www.vialtopartners.com) or on request. These documents are also available to new joiners in the Employee Handbook and via the internal intranet site.

Human Rights and Modern Slavery Policy

At Vialto, we act in accordance with the internationally-recognised human rights and standards, including the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights, making them integral to the way we operate. Vialto has a global [Human Rights and Modern Slavery Policy](#) that sits alongside our [Global Code of Conduct](#), and [Global Third Party Code of Conduct](#). Our Policy outlines our principles and guidelines including the prohibition of all forms of modern slavery, child labour, forced, bonded or involuntary labour. Employees maintain free access to their legal documents and are allowed to end their employment with Vialto, with appropriate notice, with all wages owed paid.

We integrate human rights into supplier processes, conduct assessments, and provide training to ensure compliance. We encourage open communication and aim to contribute positive change and the protection of human rights. We're working to guard against being complicit in human rights violations and to uphold the human rights of our employees and any other individuals that we're in contact with, either directly or indirectly.

Vialto has a speak up culture which supports and nurtures employees, third parties and clients, which is crucial to our success and long-term results. We want individuals to feel comfortable speaking up in instances where violations of the Human Rights and Modern Slavery Policy,

Global Third Party Code of Conduct, Global Code of Conduct or other Vialto policies have occurred.

Our Ethics Whistleblower HelpLine gives employees, clients, and third parties cooperating with Vialto and relevant stakeholders a channel to report suspected violations of modern slavery and other human rights concerns. We aim to make reporting concerns as easy as possible, creating maximum opportunity for disclosures.

Ethics Whistleblower HelpLine:

Web: <https://vialtopartners.ethicspoint.com>

Mobile: vialtopartnersmobile.ethicspoint.com

Due Diligence Processes for Slavery and Human Trafficking

We acknowledge that slavery and human trafficking exist in many jurisdictions in which we operate, and from which we procure goods or services. We are a professional services organization strictly regulated by professional regulatory bodies in each of the jurisdictions in which we operate, and our ongoing assessment is that we are at low risk of slavery or human trafficking occurring within our own business.

Our Third Party Due Diligence process, managed by our Global Legal, Risk and Compliance team, identifies and manages potential human rights violations. We prioritize efforts based on salient issues—those at greater risk of severe negative impacts. Our assessment strategy considers factors like likelihood, scope, and severity to allocate resources effectively. We continuously review and update our risk assessment to adapt to changing circumstances based on the risk. By addressing salient human rights issues, we align with standards and contribute to sustainable and responsible operations.

To ensure compliance with our Global Third Party Code of Conduct, we have implemented a comprehensive evaluation process throughout the procurement journey. The supplier selection process protects the company from engaging with fraudulent or corrupt suppliers, and requires that new suppliers are vetted through a due diligence process prior to any engagement to evaluate the level of risk a supplier may pose to the company. Our evaluation processes are designed to assess supplier performance in relation to sustainability, human rights, and working conditions. This process begins with pre-screening new suppliers to identify potential risks and select responsible partners. We include specific clauses in our supplier contracts that outline our expectations and standards. Suppliers in risk territories are required to complete screening which includes subscribing to our Global Third Party Code of Conduct. A review of supplier policies and standards in relation to human and labor rights management is performed should the supplier not subscribe to our Global Third Party Code of Conduct.

Throughout the process, our Global Legal, Risk and Compliance team diligently monitors and maintains documentation to ensure transparency and accountability. By employing these processes, we uphold the principles of sustainability, human rights, and decent working conditions in our supply chain.

The due diligence assessment in this fiscal year (July 1 - June 30) has not identified any adverse impacts or significant risks of adverse impacts for the business.

Supplier Adherence to Our Values and Ethics

We have a zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors, consultants, and others that work on behalf of Vialto Partners comply with our values and ethics, our objective is to enhance our supply chain compliance program over the

next year.

Currently, through contractual agreements, we work closely with our suppliers to establish clear expectations, standards, and guidelines for our business relationship. These agreements serve as the foundation for our collaboration, outlining key deliverables, quality requirements, and ethical standards that align with our commitment to human rights.

We have a dedicated compliance team, which consists of involvement from the following teams:

- Ethics & Risk and Compliance Team
- Legal Team
- Human Resources
- Procurement

Through contractual agreements, we work closely with our suppliers to establish clear expectations, standards, and guidelines for our business relationship. These agreements serve as the foundation for our collaboration, outlining key deliverables, quality requirements, and ethical standards that align with our commitment to human rights and decent working conditions.

We prioritize building close relationships with our suppliers, recognizing that effective communication and mutual understanding are key to successful partnerships. We maintain regular dialogue, fostering an environment of trust, transparency, and collaboration. This allows us to address any potential issues proactively, identify areas for improvement, and work together towards shared goals.

Furthermore, our partnership management approach emphasizes long-term sustainability and mutual growth. We strive to establish partnerships that go beyond transactional interactions, fostering a sense of shared values and objectives. By collaborating closely with our suppliers, we can collectively enhance supply chain resilience, manage risks, and drive innovation.

Overall, our approach to supply chain management reflects our commitment to ethical practices, social responsibility, and the well-being of all individuals involved. We continuously assess and improve our supplier relationships to ensure that they align with our core values, contributing to a responsible and sustainable global supply chain.

As a professional services organization, Vialto procures products and services from suppliers for the benefit of the organization and for purposes of supplying services for client engagements, including, but not limited to: Technology (e.g., hardware, software), Business Services (e.g., facilities management, travel) and Human Capital (e.g., employee benefits, managed services providers, subcontractors), through fair and equitable global and domestic sourcing.

Vialto utilized 6,358 suppliers between May 2023 to January 2024 (this includes Third Party Network and suppliers, but excludes the 13 territories not on SAP) with a total supply chain spend of USD 345,067,315.

* Even though the Vialto FY is June to July, the information provided related to May 2023 to Jan 2024 as SAP only became functional May 2023 and therefore required information could only be obtained from then.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide new joiner training and annual training to our employees, contractors, consultants and others working on behalf of Vialto Partners in various languages.

In the near future, we will require our business partners to provide training to their employees

and suppliers and providers.

Our Effectiveness in Combating Slavery and Human Trafficking

As a newly formed organization we have not developed metrics for measuring our effectiveness at preventing modern slavery and human trafficking in our business and supply chains. However, over the next two years we plan to build our program, which will include assessments of areas including, but not limited to, labor, human rights and modern slavery. As part of the assessment, our suppliers will be required to share evidence demonstrating alignment with the UN Guiding Principles on Business and Human Rights, UN Global Compact Principles, International Labour Organisation, Global Reporting Initiative and ISO 26000. Any potential gaps will be flagged as 'high', 'medium' or 'low', allowing us to prioritize our follow-up due diligence and consultation with our suppliers to support corrective action.

Our Commitment

As a newly established company, we will continue to improve and identify areas where further progress needs to be made.

We have identified several areas which will assist in our transparency commitments.

AREAS	COMMITMENT	DESCRIPTION	YEAR IDENTIFIED	DUE DATE	STATUS
Policies, Codes of Conduct and Supplier Contracts	Review policies, Codes of Conduct and applicable contracts	Expand where necessary to ensure transparency in our commitments	2024	Annually	In progress
Supply Chain due diligence	Improve due diligence over our supply chain	Extend due diligence in relation to all suppliers at onboarding and annually	2024	Ongoing	In progress
Supplier Questionnaires	Extend and / or enhance questions relating to modern slavery	To extend supplier questionnaire to ensure comprehensive management of risks related to human rights	2024	Ongoing	In progress
Recruitment processes	Improve our global HR policy and processes with suppliers	Continue to perform analysis to ensure our recruitment processes are aligned to the human rights purposes.	2024	To commence	Not Started
Supply Chain Program: Modern Slavery / Human Rights Program	Compile and implement a Supplier Survey program	Identify KPIs and track effectiveness of the implemented programme to report on key suppliers human rights policies and procedures	2024	To commence 2025	Not Started
Training	Assess content and frequency of training	Staff to receive comprehensive refresher training on regular basis to ensure familiarization with human rights and modern slavery principles	2024	Annually	In place

This annual statement is made pursuant to section [54\(1\) of the Modern Slavery Act 2015](#) and constitutes Vialto Partners' slavery and human trafficking statement for the financial year ending June 30, 2024. It was approved by the board on Friday, May 31, 2024.

Leo Palazzuoli

Leo Palazzuoli
Chief Clients and Markets Officer

Date: June 13, 2024