



Voluntary Modern Slavery and Human Trafficking Transparency Statement

Introduction

We believe all organisations can positively impact society and create more stable and long-term opportunities for economic growth. Our reputation and personal values underpin everything we do.

In line with our values, Varri Consultancy is making a voluntary modern slavery and human trafficking statement relating to section 54 of the Modern Slavery Act 2015 of the United Kingdom (UK):

We oppose slavery and human trafficking in all forms and voluntarily make this statement to describe the steps we have taken to identify, prevent, and mitigate the risk of modern slavery and human trafficking within our business or supply chains.

About Us

Our Business

Varri Consultancy is an independent management consulting boutique specialising in strategy, risk, and governance advisory services. We support organisations in addressing complex commercial, regulatory, operational, and stakeholder challenges through a focus on long-term value creation, sound decision-making, and responsible business practices.

Our Legal Structure

Varri Consultancy is a sole establishment registered in Dubai, United Arab Emirates (UAE), and is directly owned by the founder, Johnny Kollin. It has no subsidiaries, associates, or parent company.



Our People

Várri Consultancy's work is carried out by the founder, together with employees, consultants, or contractors engaged where appropriate.

The UAE does not currently have a general statutory minimum wage applicable to expatriate employees in the private sector. Article 27 (*Minimum Wage*) of [Federal Decree-Law No. 33 of 2021 Regulating Labour Relations](#), which came into force on 2 February 2022, authorises the UAE Cabinet, upon the proposal of the Minister of Human Resources and Emiratisation and in coordination with the relevant authorities, to issue a resolution determining a minimum wage for workers or any category of workers. As of the date of this statement, no general minimum wage has been established under that provision for private-sector employees.

The UAE has, however, introduced minimum salary requirements for certain categories of Emirati nationals employed in the private sector as part of its Emiratisation programme. Effective 1 January 2026, [the minimum salary for Emirati employees in the private sector is AED 6,000 per month](#). Várri Consultancy did not employ any UAE nationals during the reporting period, and therefore these requirements did not apply.

Várri Consultancy is committed to fair and responsible remuneration. We seek to ensure that our employees are compensated in accordance with applicable law, market conditions, and internal remuneration practices. Where relevant, we also consider recognised living wage benchmarks when reviewing compensation arrangements. Historically, Várri Consultancy has benchmarked remuneration against a UAE living wage standard and has ensured that employee compensation exceeded that benchmark where applicable.

Our Supply Chain

Várri Consultancy's supply chain is relatively limited and consists primarily of professional advisers, software and technology providers, information service providers, banking and financial institutions, communications providers, insurance providers, co-working and business support services, and other professional services providers.

Our direct suppliers are generally located in the UAE, the United Kingdom, the European Union, and the United States. We recognise that our visibility over lower-tier suppliers is limited, particularly where services are provided through larger technology, financial, professional services, or infrastructure providers. We therefore take a proportionate and risk-based approach to supplier due diligence and contractual protections.



Our Policies on Modern Slavery and Human Trafficking

The UAE has enacted legislation criminalising human trafficking and has established national policies and initiatives to prevent exploitation and protect victims. Information on the UAE's framework for combating human trafficking is available from the UAE Government's official portal on [Combating Human Trafficking](#).

Várri Consultancy is not required to publish a statement under section 54 of the UK Modern Slavery Act 2015 because it does not meet the applicable statutory criteria. Nevertheless, we voluntarily publish this statement to demonstrate our commitment to ethical business conduct and to describe the measures we take to identify, prevent, and mitigate the risk of modern slavery and human trafficking within our operations and supply chains.

We are committed to conducting business with integrity, respecting human rights, and procuring goods and services responsibly. Our Anti-Slavery and Human Trafficking Policy, adopted in 2021, sets out our commitment to preventing forced labour, human trafficking, servitude, debt bondage, and other forms of exploitation. The policy supports our wider governance framework and helps ensure that appropriate controls are in place to reduce the risk of modern slavery occurring within our business or supply chain.

While we consider the overall risk of modern slavery within our operations to be low, we remain committed to carrying out proportionate due diligence and to promoting responsible business practices among our suppliers and business partners.

We have outlined below our key considerations and policies concerning our suppliers and clients.

Suppliers and Clients

Várri Consultancy is committed to understanding and addressing the risk of modern slavery and human trafficking within its operations and business relationships. As a boutique professional services firm, our supply chain is relatively limited and consists primarily of professional advisers, software and technology providers, banking and financial institutions, communications providers, training providers, and other business support services.

We seek to engage suppliers that share our commitment to ethical business conduct and respect for human rights. Where appropriate and proportionate to the nature of the engagement, we undertake due diligence on prospective suppliers and other counterparties before entering into a business relationship. Where appropriate, we may also include provisions relating to compliance with applicable laws, human rights, anti-slavery, and ethical business practices in our contractual arrangements.



We do not currently employ agency workers. If we engage temporary or agency workers in the future, our policy is to use reputable recruitment and employment agencies and to require compliance with applicable labour laws and our Anti-Slavery and Human Trafficking Policy, or equivalent standards.

We also conduct appropriate due diligence on prospective clients and counterparties as part of our client acceptance procedures. This supports our broader commitment to conducting business responsibly and managing legal, regulatory, reputational, and ethical risks.

As our business continues to develop, we will review and enhance our governance, due diligence, and supplier management processes on a proportionate basis. This may include further consideration of human rights due diligence measures designed to identify, prevent, mitigate, and address potential adverse human rights impacts arising from our operations and business relationships.

Risk Assessment, Prevention, and Mitigation

As a boutique professional services firm, Várri Consultancy considers the overall risk of modern slavery and human trafficking within its direct operations to be relatively low. However, we recognise that modern slavery risks can arise in any jurisdiction, industry, or supply chain, including through lower-tier suppliers over which we may have limited visibility.

We therefore seek to take a risk-based and proportionate approach to identifying and addressing potential risks within our business relationships. When assessing suppliers, clients, and other counterparties, we may consider factors including:

- the nature of the services being provided;
- the geographic locations in which counterparties operate;
- the sector and associated labour practices;
- publicly available information regarding legal, regulatory, reputational, or ethical concerns; and
- any other circumstances that may indicate an elevated risk of modern slavery, forced labour, human trafficking, or related human rights abuses.

Where appropriate, concerns identified through our due diligence processes may result in enhanced enquiries, contractual protections, ongoing monitoring, or a decision not to proceed with a particular business relationship.



Effectiveness

We review the effectiveness of our approach to preventing modern slavery and human trafficking through ongoing oversight of our policies, due diligence activities, awareness and training measures, and business relationships. During the reporting period, we were not aware of any instances of modern slavery or human trafficking within our business or supply chain.

Awareness and Training

We seek to maintain awareness of modern slavery and human trafficking risks within our business and supply chain. Where appropriate, relevant personnel may receive training, guidance, or information on identifying and responding to indicators of modern slavery, forced labour, and human trafficking.

About this Statement

This voluntary slavery- and human trafficking statement is made in connection with section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2025. It has been approved by the Founder and Managing Director of Várri Consultancy on the date set out below.

Johnny Kollin
Founder and Managing Director
31 July 2026