

United Guarding Services Ltd

Modern Slavery & Human Trafficking Policy



Modern slavery & human trafficking is an unquestionable and indefensible violation of an individual's basic human rights. United Guarding recognises that as a commercial organisation it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms.

We are committed to preventing slavery and human trafficking in our corporate activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

United Guarding ensures that there is no slavery or human trafficking within its own business nor our supply chains. We pursue a responsible purchasing policy consistent with our business ethics, respect for fundamental worker rights, and environmental standards, all of which are key conditions for doing business with United Guarding.

Current Activity:

We undertake due diligence when considering taking on new suppliers, and are in the process of reviewing our existing suppliers. This due diligence includes:

- Understanding our supply chain so as to identify and assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating modern slavery and human trafficking risks through the completion of our 'Quality and Sustainability Agreement' and our 'Supplier Declaration'.
- Conducting supplier audits – we work with our suppliers to ensure their supply chains are free from modern slavery and human trafficking and this includes reserving the right to audit their activities in this regard.
- Terminating our relationship with suppliers that fail to improve their performance in line with an action plan.

We operate the following policies that assist our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

Whistleblowing Policy - we encourage all our employees, to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature. The Modern Slavery Act 2015 (the "Act") is specifically mentioned within this policy which is published in the Company handbook.

Employee Code of Conduct- Our employee handbook makes it clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour at all times.

Supplier/Procurement Code of Conduct: The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate

that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. As part of the supply chain selection process all potential and existing suppliers are required to complete a Supplier Questionnaire to assess their suitability as a supplier. Within the Supplier Questionnaire all suppliers are required to provide evidence of their compliance towards Labour Standards and the principals of this standard as well as the Asylum & Immigration Act 2006. This enables the procurement team to identify any potential risks to the quality of the service provision or goods being provided by the supplier and prevent any slavery or human trafficking. All suppliers are audited against the supplier code of conduct. Serious violations of the Company's Quality and Sustainability Agreement will lead to the termination of the business relationship.

Recruitment Policy: United Guarding only employs people on a permanent contractual basis. Prior to commencement of employment all employees are subject to right to work, residency, SIA and employment checks in accordance with the Immigration Asylum and Nationality Act 2006, Security Industry Authority and BS7858 Code of Conduct. The Recruitment Policy is compliant to all EU and UK legislation, including the minimum wage and therefore is not at risk of slavery and human trafficking.

Business Ethics Policy - our policy sets out the core values which we expect to be observed throughout the Company. The policy specifically mentions the Act and is published in the Company handbook.

Anti-Bribery/Fraud Policy: The organisation's Anti Bribery Policy aims to prevent any form of bribery being committed within our company by any stakeholder(s) associated with our business. United Guarding's Directors foster a culture of integrity where bribery is unacceptable. This policy is communicated to all employees and forms part of the induction programme.

United Guarding requires its suppliers to comply fully with the following:

BUSINESS ETHICS

All commercial exchanges with our Suppliers are based on an honest basis across all aspects of their operations both internally and externally. All transactions will comply with applicable laws and be built on transparency, strict business practices, confidentiality and freedom of competition.

The Supplier and its sub-contractors will have in place the appropriate business ethics policies and procedures, which must be in the appropriate local language(s) and distributed to Employees, Suppliers and Agents. Suppliers must be committed to the highest standards of ethical conduct when dealing with Workers, Suppliers and Customers.

ENVIRONMENTAL POLICIES

All our Suppliers are required to apply all local applicable laws related to environmental issues. We strongly encourage our Suppliers to develop a sustainable environmental policy, which aims at reducing waste and minimising the environmental impact of their operations. The Supplier will provide United Guarding with details of their environmental policy.

RESPECT FOR THE BASIC HUMAN RIGHTS OF EMPLOYEES

United Guarding Suppliers must act in line with local legislation, the UN Guiding Principles on Business & Human Rights, the UN Universal Declaration of Human Rights, the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

The Suppliers must agree to:

- Promote equal opportunities for, and treatment of its employees irrespective of race, nationality, social background, disabilities, sexual orientation, pregnancy or maternity, political or religious conviction, sex, age; marital or civil partnership status or any other factor which cannot be justified;
- Not employ or make anyone work against their will or under circumstances in which their labour may be coerced and exploited;
- Respect the personal dignity, privacy and rights of each individual;
- Refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
- Prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- Provide fair remuneration and guarantee the applicable national statutory minimum wage, union agreements or industry standards;
- Recognize, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organizations or trade unions;
- Employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14. In the case of jobs with a higher degree of risk, no workers under the age of 18 should be employed.

REPORTING BREACHES OF THE CODE

All Suppliers are expected to self-monitor their compliance with this Supplier Code of Conduct. In the first instance, known or potential breaches should be reported to United Guarding Financial Director.

Directors Approval

This statement has been approved by the Directors of United Guarding Services who will review and update it annually.

This statement is made pursuant of section 54(1) of the Act and constitutes our slavery and human trafficking statement.

Michael Collyer | Managing Director