Securitatem Group Ltd

MODERN-DAY SLAVERY AND HUMAN TRAFFICKING POLICY

1. Introduction

1.1 This policy applies to Securitatem Group Ltd and its affiliated companies, including Securitatem Consultancy Ltd and Securitatem Installations Ltd (collectively referred to as "the Company"). It applies to all Directors, employees, workers, contractors and subcontractors undertaking activities on behalf of the Group.

1.2 Securitatem Group is committed to preventing modern slavery and human trafficking within its operations and supply chains. The Group recognises its responsibilities under the Modern Slavery Act 2015 and will take reasonable and proportionate measures to identify, prevent and address potential exploitation.

1.3 This mandatory policy forms part of the Company's management arrangements. All personnel are required to comply with its provisions. The Company reserves the right to review and amend this policy in accordance with applicable legislation and operational requirements.

2. Company Statement

2.1 Securitatem Group maintains a zero-tolerance approach to modern slavery, human trafficking, forced labour, servitude, debt bondage and other forms of labour exploitation, including child labour. The Group will not knowingly engage with or support organisations involved in such practices.

2.2 The Group recognises that modern slavery risks may exist within both UK and overseas operations, including recruitment arrangements, temporary labour, contractors, subcontractors and the supply of goods and services.

2.3 Appropriate checks will be undertaken when selecting and approving suppliers and subcontractors. These checks will be proportionate to the nature of the services provided, geographical location, workforce arrangements and potential exposure to labour exploitation.

2.4 Where concerns are identified, the Company will assess the circumstances, seek appropriate clarification and determine whether additional controls, corrective actions or further investigation are required. Business relationships may be suspended or terminated where serious concerns are substantiated and cannot be adequately addressed**.**

3. Management Responsibilities

3.1 The Group CEO and Company Directors retain overall responsibility for ensuring this policy is implemented, maintained and periodically reviewed.

3.2 Directors and Senior Management shall ensure that:

- Modern slavery risks are considered within relevant business activities and procurement arrangements.
- Employees and relevant contractors are made aware of this policy.
- Appropriate resources, information and training are provided.
- Reported concerns are assessed promptly, confidentially and appropriately.
- Corrective actions are implemented and monitored where deficiencies are identified.
- Compliance with this policy is considered during relevant management reviews.

3.3 Managers and Supervisors are responsible for promoting awareness of this policy, identifying potential indicators of exploitation and reporting concerns through the established arrangements.

3.4 All employees and workers are expected to act responsibly, comply with this policy and report any reasonable suspicion of modern slavery or human trafficking.

4. Supplier and Subcontractor Due Diligence

4.1 Modern slavery considerations shall form part of the supplier and subcontractor approval process, with the level of assessment determined by the potential risks associated with the goods or services being provided.

4.2 Where appropriate, supplier assessments may include:

- Confirmation of compliance with applicable employment and labour legislation.
- Review of recruitment arrangements and the use of employment agencies.
- Verification that workers are not required to surrender passports or personal identification documents as a condition of employment.
- Confirmation that recruitment fees, unlawful wage deductions or other arrangements do not place workers into debt bondage.
- Review of relevant policies, contractual arrangements and supporting records.
- Consideration of previous allegations, incidents or identified compliance concerns.

4.3 Where potential risks are identified, additional information or evidence may be requested before approval or continuation of a business relationship.

4.4 Suppliers and subcontractors shall be expected to cooperate with reasonable enquiries and implement appropriate corrective measures where concerns are substantiated.

4.5 Records of relevant supplier assessments, concerns and corrective actions shall be maintained in accordance with the Company's management arrangements.

5. Reporting Concerns

5.1 All employees, workers and contractors are encouraged to report any suspected modern slavery, human trafficking or labour exploitation without delay.

5.2 Concerns may be reported to a Line Manager, the Operations Director or another appropriate member of Senior Management. Where the concern involves an individual's immediate management, an alternative reporting route shall be available.

5.3 Reports shall be treated sensitively and confidentially, with information shared only where necessary to assess the concern, protect individuals or meet legal obligations.

5.4 No employee or worker shall be subjected to retaliation, victimisation or disadvantage for raising a genuine concern in good faith, even where the concern is subsequently found to be unsubstantiated.

5.5 Where an individual is believed to be in immediate danger, appropriate emergency assistance shall be sought. Suspected criminal activity shall be referred to the relevant authorities where appropriate, taking account of the safety and welfare of affected individuals.

6. Investigation and Corrective Action

6.1 Any reported concern shall be assessed promptly by an appropriate member of Senior Management to determine the nature of the allegation, the potential risks to affected individuals and the action required.

6.2 Investigations shall be conducted fairly, objectively and with appropriate regard for confidentiality, evidence preservation and the protection of potentially affected persons.

6.3 Where allegations involve a supplier, contractor or subcontractor, the Company shall determine whether additional checks, contractual intervention, corrective measures or suspension of activities are necessary.

6.4 Where exploitation is suspected or identified, priority shall be given to the safety and welfare of affected individuals. Decisions concerning contractual or disciplinary action shall consider the potential consequences for those individuals.

6.5 Findings, decisions and corrective actions shall be recorded, with responsibility and appropriate completion timescales assigned. Actions shall be followed up to confirm their effectiveness.

7. Training and Awareness

7.1 The Company shall ensure that employees and workers have access to this policy and understand their responsibility to recognise and report potential concerns.

7.2 Modern slavery awareness shall be incorporated into relevant induction, management communication or refresher training arrangements, proportionate to the individual's responsibilities and exposure to risk.

7.3 Personnel involved in recruitment, procurement, supplier management and contractor supervision shall receive appropriate guidance on recognising potential indicators of exploitation and the actions required when concerns arise.

7.4 Records of relevant training, briefings and policy acknowledgements shall be maintained.

8. Compliance

8.1 Employees, workers and contractors shall be required to acknowledge this policy in accordance with the Company's established arrangements.

8.2 Failure to comply with this policy may result in appropriate disciplinary or contractual action, up to and including termination, subject to applicable legislation and contractual requirements.

8.3 Employees may continue to use the Company's Grievance Procedure for employment-related complaints. However, suspected modern slavery or human trafficking may also be reported directly through the arrangements identified in Section 5.

8.4 The Company shall ensure that concerns are considered objectively and that appropriate actions are taken to prevent recurrence.

9. Monitoring and Review

9.1 The effectiveness of this policy and associated management arrangements shall be reviewed annually, or earlier where significant changes occur in legislation, business activities, supply chain arrangements or identified risks.

9.2 The review shall consider, where applicable:

- Reported concerns and their outcomes.

- Supplier and subcontractor assessments.
- Identified risks and the effectiveness of existing controls.
- Completion and effectiveness of corrective actions.
- Training and awareness requirements.
- Relevant legislative or operational changes.

9.3 The Group CEO shall retain oversight of the policy review process and approve significant amendments.

9.4 The Company shall maintain appropriate records demonstrating implementation, monitoring and review of this policy.

10. Review

10.1 The effectiveness of this policy and associated arrangements will be reviewed annually or when there is a change in circumstances/work practices, or the introduction of new legislation. All reviews and amendments will be made under the direct supervision of the Securitatem Group's CEO.

Group CEO:

Joseph McGee

Policy reviewed: 12/10/2026