

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Ethical employment, labour-provider and supply-chain controls

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1. POLICY STATEMENT

1.1 2012 Security Ltd has zero tolerance for modern slavery, human trafficking, forced labour, debt bondage, servitude, compulsory labour and child labour. The Company will use proportionate controls to identify and reduce exploitation risk in its own operations and supply chains.

2. SCOPE

2.1 This policy applies to directors, employees, agency personnel, subcontractors, labour providers, suppliers and business partners. Particular attention is required in recruitment, subcontracted security labour, temporary labour, uniforms/PPE and other supply chains where exploitation risk may be higher.

3. RECRUITMENT AND EMPLOYMENT CONTROLS

- no worker-paid recruitment fees or deposits;
- verification of identity and right to work;
- written terms and transparent pay arrangements;
- wages paid lawfully and without unlawful deductions;
- no retention of passports or identity documents except brief lawful inspection/copying;
- workers remain free to leave employment subject to lawful contractual notice;
- concerns about coercion, debt, threats, unusual control of bank accounts, accommodation or transport must be escalated.

4. SUPPLIER AND SUBCONTRACTOR DUE DILIGENCE

- risk-based onboarding and approved-supplier controls;
- evidence of lawful employment, licensing, insurance and ethical labour practices;
- contractual obligations prohibiting modern slavery and unauthorised further subcontracting where applicable;
- right to request evidence, investigate concerns and suspend/terminate relationships;
- enhanced review where labour is temporary, high-risk, overseas-sourced or otherwise vulnerable to exploitation.

5. WARNING SIGNS

- a worker appears controlled by another person or cannot speak freely;
- someone else holds identity documents, bank cards or wages;
- unexplained recruitment debt, deductions or fees;
- workers are transported, housed or moved in ways they appear unable to refuse;
- excessive working hours, intimidation or threats;
- inconsistent identity/employment information suggesting coercion or trafficking.

6. REPORTING AND RESPONSE

6.1 Concerns must be reported promptly to management or through the Whistleblowing and Reporting Concerns Policy. Immediate danger should be reported to 999. The Company may preserve evidence, protect affected workers, engage clients/suppliers, notify appropriate authorities and suspend activity while risk is assessed.

7. TRAINING AND MONITORING

7.1 Relevant recruitment, HR, procurement, operations and management personnel will receive proportionate awareness training. Supplier reviews, incidents, complaints and audit findings will be used to improve controls.

8. MODERN SLAVERY STATEMENT

8.1 Section 54 of the Modern Slavery Act 2015 requires certain commercial organisations with annual turnover of £36 million or more to publish an annual slavery and human trafficking statement. Where the statutory threshold applies, or where the Company chooses to publish voluntarily, the annual statement will accurately describe the steps taken during the relevant financial year and will be approved and published in accordance with the legal requirements.



9. REFERENCES

- Modern Slavery Act 2015
- GOV.UK Transparency in Supply Chains guidance
- P-17 Recruitment and Selection Policy
- P-21 Subcontractor Policy
- P-23 Whistleblowing and Reporting Concerns Policy
- Ethical Procurement and Responsible Sourcing Policy

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