

## Introduction

This policy sets out the actions of Ward Security Holdings Group to understand all potential modern slavery risks related to the Group and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its own business processes or supply chains. As part of the Security sector the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to ensuring that it is free from such activities within any of its corporate activities.

## Organisational Structure

This policy covers the activities of Ward Security Holdings Limited, Ward Security, Call4Response and Ward Security Training Limited, all of which function within the borders of the UK. Ward Security is a provider of Security services and regulated by the Security Industry Authority (SIA), undergoing annual audits under their Approved Contractor Scheme (ACS).

## Supply Chain

Our supply chain includes direct support including resources and installations designed to assist in fulfilling our frontline operations to deliver client contracts. All such companies are vetted and verified to ensure they are regulated and audited to the same SIA ACS standards. In addition, we engage indirect support covering a wide scope of services including professional consultations, uniforms, vehicles and maintenance, security equipment and office supplies. Our documented Company Operating Procedures such as COP07 "Approval & Review of Suppliers" and COP27 "Approval & Review of Subcontracted Labour" sets out requirements and expectations to ensure our supply chain is sourced responsibly and meets appropriate standards. We meet with key suppliers regularly and reserve the right to audit any to confirm compliance with the requirements set out in this policy. Failure to allow this, or breach of the Modern Slavery Act 2015 will require a plan for immediate remedial action or will result in termination of the business relationship.

## Policies

The Executive Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all employees of Ward Security comply. In relation to our supply chain the Human Resources Director has primary responsibility for monitoring our vetting process and auditing internal control procedures to ensure they are effective in countering modern slavery. The organisation operates the following policies that describe its approach to the identification of risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Business Conduct & Ethical Policy** - This policy sets out the commitments to standards that our Directors support and that guide the conduct and operations of the Company. It also presents the responsibilities of group functions and business units in supporting those principles. Additionally, the Company expects equivalent minimum standards of conduct from its business partners. Failure to comply with our ethics is taken seriously and, depending upon the circumstances, could result in disciplinary action for employees or termination of relationships with business partners.
- **Whistleblowing policy** – We encourage our employees, customers and business partners to report any concerns related to the direct activities or supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline/complete our confidential disclosure form

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- **Ethical Purchasing Policy** - Ward Security seek to purchase goods and services which are produced and delivered under conditions that do not involve the exploitation of any persons. We promote the highest labour standards in the supply chain and expect our partners to provide a fair working and remuneration environment for their operatives. If we find evidence of or any business behaviour that violates any basic human rights such as enforced excessive working hours, child labour, unsafe or unhygienic working conditions, unreasonably low or unpaid wages, we will seek alternative options.
- **Corporate Social Responsibility** - The Directors make the necessary resources available to realise the corporate responsibilities of the company with the responsibility for our performance resting with all employees. We maintain a clear and fair employee remuneration policy and ensure we meet the national standards, whilst reviewing market rates and benchmarking ourselves within the Industry. Our equal opportunities policy ensures there can be no discrimination across recruitment, training, promotion, pay, benefits or employment terms and conditions. We operate in a way that safeguards against unfair business processes and expect our suppliers and contractors to adopt similarly responsible business practices.

### Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include evaluating the modern slavery and human trafficking risks of each new supplier as part of its approved supplier accreditation process.

### Performance indicators

The organisation has reviewed its key performance indicators (KPI's). As a result we monitor our current approved supplier/contractor process to ensure it specifically addresses the organisations approach to slavery and human trafficking and that there is a declaration they are free from any such activities within their own processes and supply chain.

### Training

We comply with UK employment laws, including right to work due diligence checks and monitoring of the working time directives. However, the organisation ensures all staff directly involved in the management of suppliers or contractors and HR professionals within the organisation complete training on modern slavery covering the basic principles of the Modern Slavery Act 2015 and how employers or employees can identify and prevent slavery and human trafficking.

Modern Slavery Statement:

As an employer with an annual Turnover of £36m+ we are required by law to issue a Modern Slavery Statement annually on our website. For further reading the following document is relevant:

P67A – Modern Slavery Statement