



Slavery Policy

Policy quality checked by:
Frano Lubura
General Manager / Quality Representative

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Date: 27/10/2020
Versions: 1.1



Modern slavery statement for financial year 2018/19

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that SSGC Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. SSGC Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

SSGC Ltd have produced a truly unique service offering with a technology and manpower blend that sets the standard for ACS approved Manned Guarding across our markets that operate exclusively within the UK.

All products and services are developed and delivered exclusively with UK sourced staff and technology. Security Manpower is either internally employed or ACS approved supplier sourced. Technology partners are all UK based. The total number of supply partners is circa thirty.

Our high risk areas

Our risk analysis shows that the only supply market area of high risk is the procurement of garments (Security Uniforms). Our approach to managing this risk is to audit our supply base in line with the ACS standard and secure anti-slavery statements including explanations of the providers own risk management approach.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

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Author: Antony Monaghan



SSGC SLAVERY

Our suppliers

SSGC Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and requests for documentary support of their own policies in respect of working conditions.

Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage and/or national living wage
4. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors on 02/07/2018. Signed by A Monaghan (Director)

Signature

Date

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