



ANTI- SLAVERY, HUMAN TRAFFICKING& WHISTLE BLOWING POLICY

General - Policy statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in our supply chains.

We are also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our suppliers and other business partners and expect our suppliers to hold their own suppliers to the same high standards. This policy applies to all persons working for SB Security Solutions, in any capacity.

Policy Responsibilities

The Board of Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular briefings on it and the issue of modern slavery in supply chains.

Policy Compliance

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your Line Manager and/or report it in accordance with our Whistle Blowing Policy as soon as possible. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your Line Manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in your Staff Handbook or on the staff Portal.

Communication, Training and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for the Company. Regular briefings will also be provided as necessary to all our staff.

Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Policy Breaches

Any employee who breaches this policy will face disciplinary action. This could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Due diligence processes for slavery and human trafficking

We have a zero-tolerance approach to slavery and human trafficking. To ensure all those in our supply chain comply with our values and as part of our initiative to identify and mitigate risk of slavery and human trafficking in the delivery of our services and supply chain we will put in place systems to:

- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

All SB Security Solutions Limited suppliers are expected to implement a zero-tolerance approach to slavery, forced labour and human trafficking and comply with all local and national laws and regulations. Our procedures are designed to identify and assess areas of potential risk.

Our procedures require that all Suppliers complete a supplier questionnaire. As part of the questionnaire suppliers are required to:

- Confirm they will comply with the Modern Slavery Act 2015.
- Confirm they have reviewed their business operations and their supply chains for evidence of any instances of slavery, forced labour or human trafficking.

In addition, we will carry out an audit of all existing suppliers. This will include:

- Asking all existing suppliers to agree to this policy and the principles of the Modern Slavery Act 2015.
- Organisations with a turnover of more than £36 million will be required to provide a copy of their Modern Slavery Statement.

Whistle Blowing Policy & Procedure

SB Security Solutions Limited is committed to the highest standards of integrity, honesty, and accountability, consistent with the business sectors in which it operates and the expectations of its customers. For this reason, all employees have a legal duty to act in good faith. An important element in achieving and maintaining these qualities is a mechanism for enabling employees to raise concerns they may have about potential malpractice or wrongdoing, without fear of reprisals.

This policy sets out a process to facilitate the reporting of concerns involving malpractice or impropriety, in confidence, which must be raised in good faith. It applies to all employees and also to any other individuals who work within the Company including temporary staff, consultants and contractors. The policy extends to give legal protection to employees against being dismissed or penalised as a result of publicly disclosing concerns such as:

- Criminal activity, such as fraud, bribery, dishonesty, theft or embezzlement.
- Failures to comply with legal or statutory obligations.
- Miscarriages of justice.
- Endangering an individual's health and safety.
- Environmental damage or pollution
- Other improper conduct or unethical behaviour.
- Attempts to conceal any of the above.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor does it substitute or replace the grievance procedures; nor is the policy a channel for employees to raise matters in relation to their terms and conditions of employment.

All concerns must be raised in good faith. Anyone who abuses the policy (for example by maliciously raising a concern they know to be untrue) will be subject to disciplinary action. This

policy will protect those who disclose malpractice or impropriety in good faith and will allow employees to have such concerns treated as confidential.

Employee Assurance

Employees who raise a genuine concern will not be at risk of damaging their employment position or working arrangements as a result. Provided you act in good faith, in the reasonable belief that there may be malpractice or impropriety, it does not matter whether or not your concern proves to be well founded. You will not be penalised or victimised for raising a genuine concern and anyone responsible for such conduct will be subject to disciplinary action.

Employees may decide that they want to raise a concern in confidence and ask for their identity to be protected. If that is the case, their details will not be disclosed without prior consent. If a situation arises where it is not possible to deal with the issues raised without revealing the individual's identity (for instance because the evidence is needed in court), there will be a discussion with the individual in advance of any steps taken.

This policy does not cover the situation where information about malpractice is received anonymously, but discretion will be used in the investigation of such information.

Responsibilities

Employees

If an employee has concerns about malpractice or impropriety, they are responsible for reporting this through the appropriate Line Management channels.

Employers

Ensure that employees who raise concerns under this policy in good faith are not penalised or subject to any less favourable treatment as a result of raising their concerns.

Once a concern has been reported, SB Security Solutions Limited will undertake an initial investigation and establish what action should be taken and how best to resolve matters. If the issues are better dealt with via another Company policy, this, along with the process to be applied will be discussed with the employee.

SB Security Solutions Limited will instigate appropriate enquiries and/or investigations, and will:

- Confirm who is handling the issues and how they can be contacted.
- Confirm if further assistance from the reporting individual is needed.
- Write confirming the concerns raised and outline how it is proposed to handle matters.

Reporting Processes

Internal Notification

Employees can raise concerns with their Line Manager or the Human Resources Manager in the first instance. If this is inappropriate (for example, the concern directly involves them), they can report the matter to the Senior Operations Manager.

Through the above channels, notifications may be made orally or in writing and must state the facts as clearly as possible, giving full details for those believed to be involved and the precise nature of the malpractice or impropriety. If the reporting employee has a direct personal interest in the matter, this must be declared at this stage.

When raising concerns, the employee must make it clear if they want to raise the matter in confidence so that appropriate steps can be taken. On receipt of a complaint of malpractice or impropriety, the member of staff who receives the complaint must pass the information on to the HR Manager as soon as reasonably possible.

External Notification

If the employee believes none of the above notification channels are appropriate to report their concern or the allegation is of a serious or sensitive nature, or if a complaint is not resolved, it should be reported through the following SB Security Solutions Limited channel:

Website: www.sbsecuritysolutions.co.uk

HR Manager: Fran Piddington - Telephone: 02392 598467

The notification must state the facts as clearly as possible, giving full details for those believed to be involved and the precise nature of the malpractice or impropriety.

Public Concern at Work

There is an independent charity, which employs their own legal staff, who can give free confidential advice on how to raise a concern. They are not available as a conduit for reporting matters. They can be contacted on: Telephone 020 7404 6609 or email on: helpline@pcaw.co.uk

Advice, Conciliation and Arbitration Service (ACAS). This is a Government supported advice and assistance provider who provide free information and may be contacted on: Telephone 08457 474747.

Review

This Policy document will be reviewed annually or if legislation, regulations or company policies are revised.

S Bettsworth

Steve Bettsworth

Managing Director