

# VEROGUARD SYSTEMS HOLDINGS LIMITED

## MODERN SLAVERY POLICY

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### 1. COMMITMENT

The Company is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

The policy applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

The Company expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its values.

The Company will only do business with organisations who fully comply with this policy, or those who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on slavery and human trafficking that the Company is required to produce further to the transparency in supply chain requirements of Section 54 of the *Modern Slavery Act 2015 (MSA)*.

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### 2. WHAT DO WE MEAN BY MODERN SLAVERY?

Modern slavery can take many forms; it is a complex and multi-faceted problem. The MSA covers four key criminal activities:

- (a) **Slavery:** where ownership is exercised over an individual
- (b) **Servitude:** involves the obligation to provide service imposed by coercion
- (c) **Forced and compulsory labour:** all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
- (d) **Human trafficking:** involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the MSA, include:

- (e) **Child labour:** whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires colleagues to play a part and remain vigilant to the risk in all aspect of the Company business and business relationships.

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### 3. HOW VEROGUARD SEEKS TO EMBED THE ANTI-SLAVERY POLICY IN PRACTICE

To underpin the commitments laid out in this policy, the Company aims to implement the following measures over the course of the financial year 2021/22:

- The Company will conduct risk assessments to determine which parts of the business and which supply chains are most at risk from modern slavery so efforts can be focused on the areas that are most 'at risk'

- Where appropriate, as informed by the risk assessment, the Company will engage directly with new suppliers in respect of the Anti-Slavery Policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.
- Our contractual documentation will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour in line with this policy.
- We also make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.

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#### **4. RESPONSIBILITY FOR THIS POLICY**

The Board has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The Chairman will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All executives are responsible for ensuring that their direct reports comply with the provisions of this policy in the day to day performance of their roles.

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#### **5. COMMUNICATION AND EMPLOYEE AWARENESS TRAINING**

Managers will ensure that relevant colleagues receive adequate training on this policy and any supporting processes applicable to their role.

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#### **6. BREACHES OF THIS POLICY**

The breach of this policy by an employee, director or officer of the Company may lead to disciplinary action being taken in accordance with the Company's Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

All colleagues will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the Chairman.

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#### **7. STATUS OF THIS POLICY**

This Modern Slavery Policy will be reviewed by the Board on a regular basis.

This notice reflects the Company's current practice.

The Company will update the notice from time to time to reflect legal and operational requirements.