VPO-111

Anti-Slavery, Modern Slavery and Human Trafficking Policy

1. Policy Statement

Versatile Security Services Ltd is committed to preventing modern slavery, forced labour, and human trafficking in all its business activities and supply chains. We recognise our responsibility to act ethically and with integrity and to implement effective systems and controls to ensure modern slavery does not take place within our organisation or our supply chain.

We adopt a **zero-tolerance approach** to modern slavery and are committed to acting ethically, transparently, and in full compliance with the **Modern Slavery Act 2015** and ISO 45001 and in respect of Human Rights legislation.

We recognise our responsibility to protect human rights and ensure that no form of exploitation is present within our workforce, subcontractors, or suppliers and reflects our commitment to respecting human rights.

2. Scope

This policy applies to:

- All employees, workers, contractors, and agency staff
- Suppliers, subcontractors, and business partners
- All business affiliates and supply chains, both within the UK and internationally
- All employees, security officers, supervisors, managers, and directors
- Agency staff, subcontractors, and self-employed operatives
- Recruitment agencies, labour providers, and suppliers
- All operations, including guarding, mobile patrols, control rooms, and events

3. Definitions

Modern Slavery includes:

- Slavery and servitude
- Forced or compulsory labour
- Human trafficking

as defined under the Modern Slavery Act 2015.

4. Risk Context – Security Industry

The security sector presents specific risks, including:

- Use of subcontracted or agency labour
- Unsocial hours and lone working
- Migrant labour within the workforce
- Rapid recruitment for contracts or events

Versatile Security Services Ltd actively manages these risks through strict recruitment, vetting, and supplier controls.

5. Risk Assessment and Due Diligence

We take steps to identify and reduce the risk of modern slavery by:

- Assessing risk within our operations and supply chains
- Conducting supplier due diligence
- Including anti-slavery clauses in contracts
- Reviewing supplier practices where appropriate

Higher-risk activities and suppliers are subject to enhanced scrutiny.

6. Definitions

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.

7. Our Commitment

Versatile Security Services Ltd has a zero-tolerance approach to modern slavery or any form of exploitation or cheap labour, 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 own business or in any of our supply chains.

We are also committed to ensuring that there is transparency in our own 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 contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers and affiliates will hold their own suppliers to the same high standards.

Our pledge is to ensure that we are consistently: -

- Acting ethically and transparently in all business dealings
- Respecting human rights
- Preventing exploitation, forced labour, and trafficking
- Taking a zero-tolerance approach to modern slavery

8. Application of the Policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

9. Roles and Responsibilities

Versatile Security Services Ltd has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. Our management team structure is clearly set out below:

Senior Management

- Ensure this policy is implemented and enforced
- Provide appropriate resources and oversight
- Ensure compliance with this policy
- Approve and review modern slavery controls
- Promote ethical business practices

Managers and Team Leaders

- Identify and assess modern slavery risks
- Ensure staff understand this policy
- Monitor working conditions
- Identify warning signs of exploitation
- Ensure staff understand their rights and how to escalate issues without fear or reprisal

Employees and Workers

- Comply with this policy
- Report concerns or suspicions of modern slavery immediately

Suppliers and Contractors

- Uphold equivalent standards
- Ensure their own supply chains are free from modern slavery
- Maintain equivalent anti-slavery standards
- Cooperate with audits and due diligence

10. Colleague and Client Involvement

We welcome your input at all levels, and you are invited to comment on this policy and suggest ways in which it might be improved.

Comments, suggestions, and queries are encouraged and should be addressed to the Managing Director.

11. Policy Compliance
All employees and associates in all forms, 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.

You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

Any breach of this policy may result in:

- Disciplinary action for employees
- Termination of contracts with suppliers or contractors

12. Reporting Concerns (Whistleblowing)

All employees and third parties are encouraged to report concerns about modern slavery. Reports can be made:

- To a line manager
- Through the company whistleblowing procedure

All reports will be taken seriously and handled confidentially. No individual will suffer retaliation for raising genuine concerns which will be treated fairly, objectively, sensitively, confidentially and in good faith.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or Company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
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 or company Director.

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 your line 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 the current employee handbook.

13. Communication 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 us, and updates will be provided using established methods of communication between the business and you.

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

14. Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which 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.

15. Recruitment and Employment Practices

We are committed to fair recruitment and employment practices by:

- Ensuring all employment is voluntary
- Prohibiting retention of identity documents
- Paying at least the National Minimum Wage / Living Wage
- Using reputable recruitment agencies
- Ensuring workers understand their terms and conditions

We ensure ethical recruitment by:

- Verifying **right to work in the UK**
- Confirming **SIA licensing** where required
- Prohibiting recruitment fees charged to workers
- Ensuring all employment is voluntary
- Paying at least the **National Minimum Wage / Living Wage**
- Prohibiting retention of passports or identity documents

Only reputable recruitment agencies are used.

16. Training and Awareness

We provide appropriate training to:

- Raise awareness of modern slavery risks
- Help staff recognise warning signs
- Ensure managers understand their responsibilities

Appropriate training is provided to:

- Managers and supervisors on identifying warning signs
- Security officers on reporting concerns
- Recruitment staff on ethical hiring practices

Training is refreshed periodically and as required.

17. Supplier Due Diligence

We manage supply chain risk by:

- Conducting supplier risk assessments
- Including anti-slavery clauses in contracts
- Reserving the right to audit suppliers
- Terminating relationships where modern slavery risks are identified

18. Disciplinary Action

Any breach of this policy may result in:

- Disciplinary action up to and including dismissal
- Termination of contracts with suppliers or subcontractors
- Serious misconduct that may be classed as a criminal offence may be passed on to the Police

19. Monitoring and Review

This policy is:

- Reviewed annually
- Updated to reflect changes in legislation or business operations

Responsibility for monitoring rests with senior management.

Approved By: Tayyib Awan
Position: Managing Director
Date: 28/12/2025



Managing Director