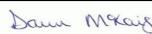




## Slavery and Human Trafficking Policy

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REVIEW/REVISION HISTORY		
REVISION	DATE	DETAILS OF CHANGE
Revision C2	06/12/2016	New format
Reviewed	10/01/2018	No change 
Reviewed	24/01/2019	No change required 

## 1. Purpose

This policy is to ensure that Securitay Ltd complies with the UK Modern Slavery Act 2015. We are proud of the conditions of employment for all our employees throughout Securitay Limited. Given the nature of our business, our MD and management teams each consider that there is minimal risk, approximating to no risk, that either within Securitay Ltd, or the very limited supply chains which support our business activities, are not involved in or tangentially supportive of, or complicit in slavery and human trafficking. The employment and procurement practices operated by the businesses within Securitay Ltd, ensures that the divisions within our Company, are viewed rightly, as excellent and supportive employers. Consequently, our Company operating as a purchaser of goods or services will expect a high level of ethical conduct from businesses with which we deal within our very limited supply chain.

## 2. Scope

This policy is applicable to all Securitay Ltd staff.

## 3. Organisation's structure

Securitay Ltd is a Private Limited Company providing security services (referred to as Securitay Ltd). Securitay Ltd has its Head Office located in Broughty Ferry, Dundee. The Company operates and is regulated by the SIA to provide static manned guarding and alarm response/keyholding services. Securitay Ltd currently operates from three principle offices in Broughty Ferry, Aberdeen and Inverness with just under 200 employees throughout Northeast Scotland and Inverness-shire. Securitay Ltd operates principally in Dundee, Aberdeen, Inverness, Perth and Fife but is licensed to operate anywhere within the UK.

## 4. Our supply chains

Securitay Ltd supply chains are very limited. Securitay Ltd offers Manned Guarding, Mobile Patrols and Alarm Response/Keyholding solutions that are a security service product. We do use routine services for the maintenance and support of our office operations in Broughty Ferry, Aberdeen and Inverness, such as technical support services for such things as IT, telephones and communications infrastructure. We do not act as a producer, manufacture or retailer of physical goods and have no supply chain in relation to such activities.

## 5. Anti-slavery policy statement

Securitay Ltd has zero tolerance to slavery and human trafficking in our supply chains or in any part of our business.

This Anti-Slavery Policy Statement is the principle articulation of Securitay Ltd's policy on slavery and human trafficking. It is intended to inform and influence all the operational procedures within the Company.

Our stated Anti-Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships, to implement and enforce effective systems and controls, to ensure (amongst our other priorities) that slavery and human trafficking is not taking place anywhere in our business or related supply chains.

## **6. Due diligence and implementation processes for slavery and human trafficking.**

As part of our initiative to identify and mitigate risks (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures appropriate to the different divisions within the Company. These include the policies and procedures in the following area:

- Third party provider and outsourcing
- Whistleblowing
- Anti-money laundering, bribery and financial crime.

Securitay Ltd also articulates a series of employee rights and benefits available to employees in the Employee Handbook, and individual contracts of employment for each member of staff.

Securitay Ltd operates a HR department led by the HR Manager, any internal audits are carried out by our internal auditor. Each operating divisions has Contracts Managers who have reviewed and agreed to the terms of this statement. Each of these departments and managers has reporting responsibilities to management and the Deputy MD of Securitay Ltd.

The Company uses the services of SIA as the external auditor. Securitay Ltd receives quarterly update reports from the external auditor and internal audits by Contracts Managers during quarterly management meetings. A combination of these procedures and functions operates to identify, assess and monitor potential risk areas, and to mitigate the risk of slavery and human trafficking occurring in our supply chains.

It should specifically be noted that Securitay Ltd is SIA, Achilles, Safe Contractor and SMS accredited and partner to the Scottish Living Wage scheme. This helps ensure office support services supplied to Securitay Ltd are in line with the UK living wage standards.

This is the first articulation of a formal Anti-Slavery Policy Statement for Securitay Ltd. In future, we will seek to ensure, when entering into a material contract, that all those in our supply chain and contractors comply with our stated Anti-Slavery Policy, in particular when seeking tenders for services or when auditing our supplies.

## **7. Training**

We will communicate this statement to all our employees to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains. Our business in the future will include these references as part of the Group's training and information materials.

## **8. Legal and regulatory purpose of this statement**

This statement is made with regard to the obligations arising under section 54(1) of the UK Modern Slavery Act 2015 (The Act). It recognises the importance of these issues for all its stakeholders. Accordingly, this statement is considered to constitute the slavery and human trafficking statement for Securitay Ltd and for the 2016 financial year and all future financial years, until it may in the future be modified or amended.