

## Modern Slavery Statement

### Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and covers the financial year ending 31 March 2020. It sets out the steps the VPS Group has taken, and is continuing to take, to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

The statement is made by VPS (UK) Limited on behalf of its UK subsidiaries (including but not limited to VPS Site Security Limited, Redfields Landscaping & Design Limited, Evander Glazing and Locks Limited and VPSitex NI Limited) and in its capacity as the parent company of the subsidiaries in the UK part of the VPS Group (together, the **VPS Group**).

This statement is also made on behalf of the parent company of VPS (UK) Limited and the other UK companies within the VPS Group including Vacant Property Security Limited, VPS Holdings Limited, Tyrion Security Bidco Limited, Tyrion Security Midco Limited, Tyrion Security Debtco Limited and Tyrion Security Topco Limited.

### Our business and supply chains

The VPS Group is a leading service provider for the protection of people, property and assets on a temporary or emergency basis. We offer a complete range of property protection, management and security services for vacant property, remote sites and infrastructure projects and selectively into occupied property.

We know that modern slavery, forced labour and human trafficking (together, **Modern Slavery**) is a global issue across all business sectors. We recognise our responsibility to implement and enforce effective systems and controls to ensure Modern Slavery is not taking place anywhere in our supply chains. We are also aware that the risks of Modern Slavery are dynamic and can develop and change quickly, so as a business we are committed to regularly reassessing and responding to the potential and actual risks we face.

We use a carefully procured range of suppliers who supply goods that we sell or rent, provide services to us and our customers, and support the operations of our businesses. These include consultants and advisers, contractors, sub-contractors and third party suppliers of goods, products and equipment.

### Our processes and policies

We have procedures in place to mitigate the risk of Modern Slavery in our supply chains. In particular, thorough checks are carried out on our suppliers through a robust procurement and supplier due diligence and audit process.

We also have in place systems and policies to support our efforts to mitigate Modern Slavery in our wider business, including the following:

- Modern Slavery policy – the policy sets out our stance on modern slavery. The policy reflects our commitment to acting ethically and with integrity in all our business relationships. This policy also explains how employees can identify any instances of this and how to report concerns.
- Whistleblowing policy – we operate a whistleblowing policy so that all employees know that they can raise concerns about practices within our business or supply chain.
- Recruitment procedures – we operate robust recruitment procedures, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking. We also ensure all employees are paid, at a minimum, national legal standards, and that all employees are provided with a safe and hygienic working environment.

As part of our ongoing initiatives to identify and mitigate risk across our business, during the past twelve months, we have taken additional steps to review and monitor our compliance with Modern Slavery legislation and to ensure that we mitigate the risk of Modern Slavery in our supply chains and business operations. These steps include the following:

- We will cease engaging or otherwise working with any subcontractor supplier where there are concerns regarding Modern Slavery (whether temporarily, until such concerns are resolved to our satisfaction, or permanently).
- We continue to operate robust processes for ensuring employees have the right to work, in accordance with current legislation.
- We have continued to carry out regular reviews of our key suppliers by identifying potential risk areas. We continue to review our supplier audit processes, including for manned guarding sub-contractors.
- Our standard terms and conditions of business for suppliers and subcontractors cover compliance with all current legislation, including the Modern Slavery Act 2015 and its requirements.
- Our Whistleblowing policy has been reviewed and updated as part of its annual review process to ensure it remains fit for purpose. We investigate any concerns raised under the Whistleblowing policy in accordance with its terms. Health and safety remains a key business focus. All internal management meetings have an agenda item to discuss health and safety, and we continue to regularly review and enhance our training and processes to ensure employees are provided with a safe working environment.

### **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that Modern Slavery is not taking place within our business if no reports are received from employees or any other third parties that Modern Slavery practices have been identified.

### **The coming year**

We have a zero tolerance approach to Modern Slavery, and we act ethically and with integrity in all our business relationships. Following a review of the effectiveness of the steps we have taken this year, to ensure there is no slavery in our supply chains or across our wider business operations, during the next financial year we will continue to identify and assess potential risk areas. We will monitor how the coronavirus pandemic may affect our business and our business relationships and

continue to enforce effective systems and controls to ensure Modern Slavery is not taking place anywhere in our supply chains. This shall include providing a suitable and safe working environment for our employees. We will act swiftly to mitigate the risk of Modern Slavery found within the VPS Group.



A handwritten signature in blue ink, appearing to read 'Lee Newman', enclosed in a light blue rectangular box.

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**Lee Newman**  
Chief Executive Officer and Director  
VPS Group