



## MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

### Introduction

This statement sets out Python Security Ltd actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the security services industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities and operates a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

### Organisational structure and supply chains

This statement covers the activities of Python Security Ltd:

Python Security Ltd operates in six primary markets:

1. Security Guarding Solutions
2. Keyholding and Mobile Response
3. Event Security
4. Technology
5. Special Projects
6. Training Services

Python Security Ltd delivers a wide range of specialist recruitment and outsourcing services to clients in both the public and private sectors.

- The nature of the supply chain is principally related to the provisions of Security services as well as suppliers used for sourcing Technology equipment

The organisation currently operates across the UK We use Risk Management processes to assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking in particular, geography, sector and cost of supply.

### Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows

- **Policies:** Reviewing and putting in place the relevant policies in relation to slavery and human trafficking is the responsibility of the Directors of the business.



- **Investigations/due diligence:** The Directors are responsible for compliance and for their supplier relationships.
- **Training:** We will provide training to relevant members of staff at induction and throughout employment where relevant to ensure that they understand the risks of modern slavery infiltrating our business or supply chains. Effective operation of our policies and procedures are aimed at mitigating this risk.

### Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

1. **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking or prohibiting of freedom, association or movement. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
2. **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
3. **Recruitment policy** The organisation uses only specified, reputable employment businesses and agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. It must be explicit that they prohibit the use of worker-paid recruitment fees.

### Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

1. Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
2. Evaluating the modern slavery and human trafficking risks of each new supplier;
3. We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
4. Engage with our suppliers both to convey to the Anti slavery and human trafficking policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
5. Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour;



6. Audits of suppliers in relation to modern slavery with regards to freedom of association, movement or employment, harsh or inhuman treatment and human trafficking;
7. Terms of business with suppliers include a modern slavery clause to match our organisations policy;
8. Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

#### **Communication and awareness of this policy**

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.

Signed

Dated