

Modern Slavery Statement

Introduction and organisation structure

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and covers the financial year ending 31 March 2023. 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, M&R Solutions Limited, Evander Glazing and Locks Limited, VPS Guardians 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 Europe's leading temporary security specialist, offering a fully integrated security proposition to customers in a range of sectors.

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 take all reasonable steps to ensure that Modern Slavery is not taking place anywhere in our supply chains. We are committed to raising awareness of these issues among our people and suppliers, and also to challenging our suppliers in the effort eradicate Modern Slavery. Equally, we take our responsibility as a supplier to our customers seriously, and we are committed to supporting our customers with their own efforts to combat Modern Slavery within their supply chains.

We are 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 (such as manufacturers of steel or monitored technology products), provide services to us and our customers (such as inspection or manned guarding services), 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 policies in relation to Modern Slavery

We have in place systems and policies to support our efforts to mitigate Modern Slavery across our business activities, 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 Modern Slavery 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.

Managing Modern Slavery risk in our supply chain

We also have robust procedures in place to mitigate and manage the risk of Modern Slavery in our supply chains, including the following:

- Checks are carried out on our suppliers through a robust procurement supplier due diligence and risk-based audit process.
- We ensure that our contracts with suppliers and subcontractors contain appropriate obligations to ensure compliance with their legal obligations regarding Modern Slavery.
- We also ensure we have the right to audit compliance and we will take appropriate steps in the event we receive allegations of Modern Slavery or find there has been a breach of these obligations.

Steps taken and key performance indicators

As part of our risk management framework 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 continue to use risk assessment processes to identify the key categories of procurement spend having a potentially higher exposure to Modern Slavery.
- We use a range of information sources to help us identify potential Modern Slavery risk areas, including the International Labour Organisation.
- We continue to review our risk-based supplier audit processes, including for manned guarding sub-contractors and facilities maintenance providers.
- We have participated fully in a variety of audit processes conducted by our customers, many of which focus on Modern Slavery, and we have used these opportunities to share best practice with other organisations and to review and enhance our own processes relating to Modern Slavery.
- We will cease engaging or otherwise working with any subcontractor or 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.
- Our standard terms and conditions of business for suppliers and subcontractors have been updated and continue to include requirements to ensure 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 legally compliant and fit for purpose. We continue to investigate any concerns raised under the Whistleblowing policy in accordance with its terms.
- Health and Safety remains a key business focus and something that we strongly advocate to keep our colleagues safe. We continue to enhance our training and processes to ensure employees are provided with a safe working environment.

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 relevant colleagues are aware of the risks of Modern Slavery, know how to report any concerns regarding Modern Slavery and we have a robust process in place to investigate and remediate any allegations or reported incidents of Modern Slavery to successful resolution.

The coming year

We strictly prohibit the use of Modern Slavery in any of our business activities, and we act ethically and with integrity in all our business relationships. During the next financial year, we will continue to identify and assess potential Modern Slavery risk areas within our business. and we will act swiftly to mitigate any risk of Modern Slavery found or alleged within the VPS Group.



Lee Newman
Chief Executive Officer and Director
VPS Group