



POL/016

Integrated Management System

Last Review: 12<sup>th</sup> May 25

Next review: 12<sup>th</sup> May 26

## Human Trafficking and Modern Slavery Policy

### 1. Purpose

H&M Security Services Ltd complies with the Modern Slavery Act 2015 and is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (“human trafficking and slavery”). Training and awareness is conducted upon induction and regular briefings. We strongly believe that we are responsible for promoting ethical and lawful employment practices. These practices are also required to be followed by our direct key suppliers. This Policy also complies with all UK legislation.

### 2. Scope

This Policy covers all employees of H&M Security Services Ltd and all its direct Suppliers. In the event anything in this Policy may conflict with local law, local law will control the interpretation and application of this Policy.

### 3. Definitions

*Human Trafficking:* the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

*Forced Labour:* all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

*Harmful Child Labour:* consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child’s education, or to be harmful to the child’s health, or physical, mental, spiritual, moral, or social development.

### 4. Rationale

H&M Security Services Ltd will not tolerate the use of unlawful child labour or forced labour in the manufacture of products it uses and does not intend to accept products from Suppliers that employ or utilise child labour or forced labour in any manner. Human trafficking and slavery are crimes under UK, and international law. These crimes exist in countries throughout the world. This Policy is to define how H&M Security Services Ltd will make efforts to eradicate human trafficking and slavery from not only within its organization, but also from its supply chains.

### 5. Requirements

H&M Security Services Ltd expects its Suppliers to conduct business with honesty, integrity, and to adhere to the following standards:

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty.
- Will ensure that the overall terms of employment are voluntary.
- Will comply with the minimum age requirements prescribed by applicable laws unless a specific contract contains stricter age requirements.
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- Will abide by applicable law concerning the maximum hours of daily labour.
- Will provide a safe and healthy working environment, including for any company-provided living quarters.
- Will respect employees’ right to freedom of association, consistent with local laws;



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- Will encourage diverse workplace and provide a workplace that is free from discrimination, harassment and or any other form of abuse.

#### **6. Certification**

By their acceptance of any purchase order from H&M Security Services Ltd, Suppliers thereby acknowledge and certify their compliance with the principles and requirements of the newest version of the Policy.

#### **7. Audits**

Suppliers must be able to demonstrate compliance with this Policy at the request and satisfaction of H&M Security Services Ltd. H&M Security Services Ltd will perform periodic random audits regarding this Policy to assure compliance. Suppliers shall identify and comply with applicable laws, regulations, standards, and relevant customers

The ultimate responsibility for this policy lies with the Managing Director who ensures that it is given and retains the highest of priorities. This policy and its implementation will be reviewed at least annually and updated as required.

Signed by:

A handwritten signature in black ink, appearing to read 'Ian Henderson', written over a horizontal dotted line.

**Ian Henderson**  
**Managing Director**  
**H & M Security Services Ltd**