



Business Management System

Modern Slavery Act

Statement

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Modern slavery statement for financial year 2017/18

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that SPC has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. SPC has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

SPC offers a unique and innovative security platform to highly skilled services throughout the UK. As a tech minded company, SPC has a raft of tools at our disposal to make sure that we are up to date with and adhere to the latest policies and practices within our industry.

Our high-risk areas

SPC has identified that during the recruitment process on a large scale, such is the nature of our business, there is a risk of allowing illegal workers to slip through the net. This could include minors that are being exploited. SPC follows a series of identity checks to ensure that those workers employed are genuine and entitled. These steps are outlined in our Recruitment Policy.

Our policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.]

Our suppliers

SPC operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For Libya based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light]

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

During KPI assessments we will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain.

Approval for this statement

This statement was approved by the General Manager on 30th April 2017

Adel Benour (General Manager)

Signature

Date