

## Modern Slavery & Human Trafficking Policy

### Scope of the Business

This policy covers the scope of all Group Solutions Limited Companies (Kings) including:

- Kings Security Systems Ltd T/A Kings Secure Technologies
- Kings Guarding Solutions Ltd
- East Fire Extinguishers & Alarms UK Ltd T/A E-fire
- Silver UK Ltd T/A Silver Group
- Cougar Monitoring Ltd T/A K-SOC
- Quidvis Ltd

### Policy Statement

Modern slavery and human trafficking are violations of fundamental human rights. They may take various forms, including slavery, bonded and forced labour, sex trafficking, child labour and domestic servitude. These criminal activities all deprive people of liberty in order to exploit them for personal or commercial gain.

At Kings, we are committed to ethical principles and require all employees to comply with the employment legislation and supply chain management legislation in the countries within which we operate.

Kings are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This policy applies to all persons who act on our behalf in any capacity, including employees at all levels, directors, consultants, contractors, agency workers, volunteers, business partners and our supply chain.

We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

### Supply Chain Management

Kings will not support or deal with any business which is known to be involved in slavery or human trafficking.

As part of our Approved Supplier Procedure, prior to approving a new supplier, we will review the controls which they undertake to eliminate modern slavery and human trafficking. Our Compliance Team will raise any concerns to our directors prior to approval of any new supplier.

If Kings deem any areas of our supply chain to be at higher risk of being involved in slavery or human trafficking the company will commit to carry out regular reviews of these organisations and any concerns shall be escalated accordingly through our business directors and to regulatory bodies.

### Identifying Risk Areas and How We Manage Them

As part of our Supply Chain Management we have identified the below areas as a potential higher risk activity;

- Subcontracted labour, particularly where temporary labour is used

To manage these risks, we:

- Prioritise enhanced due diligence for suppliers in higher-risk categories
- Require suppliers to confirm adherence to anti-slavery legislation
- Conduct periodic reviews of high-risk suppliers
- Implement escalation procedures for any identified concerns
- Review the effectiveness of labour agencies and subcontractors we work with

On completion of the above we measure the effectiveness of our controls and report internally on results of these control measures.

### Our People

All our people undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS checks.

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The company will carry out checks to ensure that payment of salary is made direct to its employees and where any potential risks are identified will work with the employee in a confidential and sensitive manner to identify any potential issues.

### Responsibility

Kings' Directors have been briefed on this subject and take responsibility for implementing this policy.

Our line managers at all levels are responsible for ensuring that all those who report to them understand and comply with this policy.

### Compliance

- All staff must read, understand and comply with this policy.
- Employees working in risk identified sectors shall receive targeted modern slavery training appropriate to their roles
- All staff must avoid any breaches of this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Staff must avoid any activity that breaches this policy.
- All staff must report to their manager at the earliest opportunity, if they suspect or believe there has been a breach of this policy, or that a breach may occur in the future.
- Staff are reminded that there are systems in place to encourage the reporting of concerns and to protect whistle blowers.

### Communication

Kings will provide all employees with information about the risks of modern slavery and human trafficking to maintain a high level of understanding of this issue in our workforce.

Our zero-tolerance approach to modern slavery will be clearly communicated to all suppliers, contractors and business partners when we commence a business relationship with them, and reinforced in our subsequent communications with them.

### Whistleblowing

Should any of our employees, customers or suppliers have any concerns regarding modern slavery or human trafficking they are encouraged to follow our Whistleblowing Policy (CPL41).

### Breaches of Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Where appropriate the matter may be passed to the police.

We will terminate relationships with suppliers, individuals or business partners working on our behalf if this policy is breached.

A handwritten signature in black ink, appearing to read 'BF'.

**Bob Forsyth**  
Chief Executive Officer