

# **Modern Slavery Statement**

#### Introduction and Organisation Structure

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and relates to the financial year ending 31 March 2025. It sets out the steps the VPS Group has taken, and continues to take, to prevent slavery and human trafficking from occurring within our supply chains or any part of our business.

This statement is issued 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, Durus Security Limited, VPS Guardians Limited, Davis Site Security 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 across a wide range of sectors.

We recognise that modern slavery, forced labour, and human trafficking (together referred to as **Modern Slavery**) are global challenges affecting all business sectors. We acknowledge our responsibility to implement and enforce effective systems and controls to take all reasonable steps to ensure that Modern Slavery is not occurring within our supply chains. We are dedicated to raising awareness of these issues among our people and suppliers, and we actively challenge our suppliers in the effort to 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 understand that the risks associated with Modern Slavery are dynamic and can evolve and change quickly, so as a business we are committed to regularly reviewing, reassessing and responding to both potential and actual risks in our operations and supply chains.

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 established a framework of policies and procedures to support our efforts to mitigate Modern Slavery across our business activities, including the following:

 Modern Slavery Policy – This policy outlines our stance on Modern Slavery and reflects our commitment to conducting all business relationships ethically and with integrity. It also provides guidance on identifying potential instances of Modern Slavery and the process for reporting concerns.



- <u>Whistleblowing Policy</u> We maintain a whistleblowing policy to ensure that all employees are aware they can report concerns about practices within our business or supply chain without fear of retaliation.
- Recruitment Procedures We enforce robust recruitment procedures, including eligibility to work
  in the UK checks for all employees, to safeguard against human trafficking. We also ensure that
  all employees are paid at least the national legal standards and are provided with a safe and
  hygienic working environment.

# Managing Modern Slavery Risk in Our Supply Chain

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

- Conducting thorough checks on our suppliers through a robust procurement supplier due diligence and risk-based audit process.
- Ensuring that our contracts with suppliers and subcontractors contain appropriate obligations to ensure compliance with legal requirements regarding Modern Slavery.
- Retaining the right to audit compliance and taking appropriate actions if we receive allegations of Modern Slavery or identify breaches of these obligations.

# Steps Taken and Key Performance Indicators

As part of our wider risk management framework to identify and mitigate risks across our business, over the past twelve months, we have continued to strengthen and monitor our compliance with Modern Slavery legislation and reduce the risk of Modern Slavery in our supply chains and business operations. These steps include:

- Continuing to utilise risk assessment processes to identify key categories of procurement spend that may have a higher exposure to Modern Slavery.
- Leveraging a range of information sources, including the International Labour Organisation, to help identify potential Modern Slavery risk areas.
- Our suppliers are issued with the VPS Supplier Code of Conduct, which contains several principles, including the responsibility that each supplier must treat its employees fairly and ethically and must implement and enforce effective systems and controls to ensure there is no modern slavery taking place within its operations.
- Ongoing review of our risk-based supplier audit processes, including those for manned guarding sub-contractors and facilities maintenance providers.
- Actively participating in a variety of audit processes conducted by our customers, many of which
  focus on Modern Slavery, and using these opportunities to share best practices with other
  organisations and to review and enhance our own processes related to Modern Slavery.
- Ceasing to engage or otherwise work with any subcontractor or supplier where there are concerns regarding Modern Slavery, whether temporarily until such concerns are resolved to our satisfaction, or permanently.



- Publishing the VPS Group's first Impact Report, which included a focus on the 'social' initiatives and strategies in place at VPS Group to ensure the continued support and wellbeing of its colleagues and the wider communities and supply chains of the group.
- Continuing to enforce robust processes to ensure employees have the right to work and ensuring appropriate working patterns are implemented (as required under the Working Time Regulations and other current legislation.)
- Reviewing and updating our Whistleblowing policy 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.
- Continuing to prioritise Health and Safety as a core business focus and strongly advocating for the safety of our colleagues. We continue to enhance our training and processes to ensure employees are provided with a safe working environment.

We will measure the effectiveness of the steps we are taking to ensure that Modern Slavery is not present within our business by monitoring whether relevant colleagues are aware of the risks of Modern Slavery, know how to report any concerns, and ensuring 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 maintain a zero-tolerance approach to Modern Slavery across all areas of our business and supply chains, and we are committed to conducting business ethically and with integrity. In the next financial year, we will continue to identify and assess areas of potential risk, strengthen our procedures where required, and act promptly to address any risks or allegations of Modern Slavery within the VPS Group.

Lee Newman

Chief Executive Officer and Director

**VPS** Group