

HUMAN TRAFFICKING & MODERN SLAVERY POLICY

1st January 2025



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It is incumbent upon the reader to ensure that he has the latest version of the Policy

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Approvals

Designation	Name	Date	Signature
Author:	Andrew Melville		<i>A Melville</i>

FIELD SERVICES GROUP COMPANY POLICY

Action:

Information:

All FSS Group Employees, Contractors, Consultants.

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MODERN SLAVERY POLICY

Effective date of Policy: 1st January 2021

1. Human Trafficking-Introduction

1.1 Human trafficking is the movement of people by means such as force, fraud, coercion or deception, with the aim of exploiting them. It is a form of modern slavery.

Human trafficking is a crime. It does not always involve international transportation. Trafficking in the UK and in overseas countries where FSS Group operates includes commercial, sexual and bonded labour. Trafficked people have little choice in what happens to them and often suffer abuse due to violence and threats made against them or their families. In effect, they become commodities owned by traffickers, used for profit.

These three elements all form part of trafficking:

- The act: recruiting, transportation, transfer, harbouring or receipt of persons
- The means: force, fraud, coercion, deception
- The purpose: exploitation

1.2 Victims include those transported around the UK or their home countries into exploitative situations, those born into servitude, or those who escape a trafficker before being exploited.

Human trafficking also includes anyone who once consented to work for a trafficker or slave master or participated in a crime as a direct result of being enslaved.

2. General Indicators of Human Slavery

All FSS Group Contractors and Employees should be aware of and be on the lookout for for the following indicators in all Local National contractors and hires that they come into contact with during their daily duties or periods of performance.

Where within the UK they become aware of the Indicators below they should contact the helpline of "Unseen.org" or report their concerns to their Line Manager who will notify the Company accordingly for further escalation.

Where during overseen employment they become aware of the Indicators below should contact their FSS Project Manager who will notify the Company accordingly for further escalation.

Please see Section 9 for further guidance.

2.1 Physical Appearance

Shows signs of physical or psychological abuse, look malnourished or unkempt, anxious/agitated or appear withdrawn and neglected. They may have untreated injuries

2.2 Isolation

Rarely be allowed to travel on their own, seem under the control, influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work

Relationships which don't seem right - for example a young teenager appearing to be the boyfriend/girlfriend of a much older adult.

2.3 Poor Living Conditions

Be living in dirty, cramped or overcrowded accommodation, and/or living and working at the same address

2.4 Restricted Freedom of Movement

Have no identification documents, have few personal possessions and always wear the same clothes day in and day out. What clothes they do wear may not be suitable for their work

Have little opportunity to move freely and may have had their travel documents retrained, e.g. passports

2.5 Unusual Travel Times

Dropped off/collected for work on a regular basis either very early or late at night

Unusual travel arrangements - children being dropped off/picked up in private cars/taxis at unusual times and in places where it isn't clear why they'd be there

2.6 Reluctant to Seek help

Avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help,

fear of deportation, fear of violence to them or their family

3. General Indicators of Forced Labour and Exploitation

- Individuals may show signs of psychological or physical abuse. They might appear frightened, withdrawn or confused
- Workers may not have free movement and may always be accompanied
- Individuals often lack protective equipment or suitable clothing and have not been trained to safely fulfil the requirements of the role
- The person may not have access to their own documents, such as ID or their passport, with the employer having confiscated them
- Individuals may not have a contract and may not be paid National Minimum Wage or not paid at all
- Workers are forced to stay in accommodation provided by the employer. This accommodation could be overcrowded
- Individuals could live on site
- Workers could be transported to and from work, potentially with multiple people in one vehicle
- The person might not accept money or be afraid to accept payment
- Workers may work particularly long hours

4. Purpose of Policy

- 4.1. To establish a policy for all current and potential suppliers, vendors employees and contractors to or of the FSS Group of companies in relation to the regulated hire of local workforce in the countries of operation, and particularly those where exploitation of human resources is more likely to occur.

- 4.2. To regulate the manner in which vendors, suppliers employees or consultants hire personnel so that legal and ethical standards of conduct that vendors, partners, manufacturers, contractors and sub-contractors (together, the "Suppliers") are expected to comply with while carrying out their fiduciary duties. Furthermore, this Policy is intended to help the Suppliers focus on areas of ethical risk, provide guidance to help them recognize and deal with ethical issues, provide mechanisms to report unethical conduct, and to help foster a culture of honesty and accountability during the hiring and employment process.

5. Principle

- 5.1. The policy is intended to, inter alia:
- 5.1.1. Protect FSS Group its vendors, suppliers, employees and consultants from the potential liabilities that may result from the illegal, inappropriate or wrongful hire of human resources
 - 5.1.2. FSS Group expects Suppliers to comply with the laws of their countries in which they are headquartered, In addition, the Supplier shall comply with any contractual arrangements entered into between the Supplier and FSS in addition to this Code of Conduct
 - 5.1.3. Ensure that the professional reputation and integrity of FSS Group is not harmed or otherwise infringed by the inappropriate and unprofessional hire of human resources
 - 5.1.4. To protect FSS Group its employees and consultants from the potential liabilities that may result from the illegal, wrongful, inappropriate or unprofessional hire of human resources.

6. Compliance with Laws, codes, regulations, and any contractual arrangements entered into with the vendor or Supplier

6.1 FSS expects the vendors and suppliers to comply with the laws of their countries in which they are headquartered, In addition, that they shall comply with any contractual arrangements entered into between them and FSS in addition to this Policy

6.2 FSS adheres to the following International codes of conduct:

- PSC 1 - Management System for Quality of Private Security Company Operations
- The International Code of Conduct for Private Security Service Providers
- ISO 18788 – 2015 Management system for Private Security Operations
- Montreux Document on pertinent International Legal Obligations and Good Practices for States related to Operations of Private Military and Security companies during Armed Conflict

7. Treating People with Dignity and Respect

7.1 Applicable Human Rights Laws

In addition to adhering with the International Codes in Para 2 above, Suppliers must adhere to the human rights law applicable in both UK and any country in which they are operating in. FSS is committed to working with all suppliers and other partners as they undertake similar assessments of their own business and develop their own approach to respecting human rights.

7.2 Human Trafficking No Forced Labour

FSS complies with all applicable laws regarding the treatment of our employees and other stakeholders. Suppliers that do business with FSS are prohibited from using slave or involuntary labor, of any kind including prison labor, debt bondage or forced labor by governments. Suppliers must not engage in human trafficking and must not use physical or psychological abuse, threats of violence, or other forms of violence, or other forms of physical or mental coercion.

Suppliers who undertake business with FSS must comply with all applicable child labor laws, including those related to hiring, wages, hours worked, overtime and working conditions. Only workers who meet the applicable minimum legal age requirement in the country where they are working may be hired by a supplier.

7.3 Diversity and Inclusion

FSS believes in recognizing and valuing our differences to deliver superior results. Bringing together people of different races, gender, education, language, skill sets, and experience enables ideas and innovation to flourish

FSS expects its suppliers to be inclusive and to ensure that their employees and other stakeholders are always treated with dignity and respect. FSS expects its suppliers to prohibit discrimination or harassment against anyone based on an individual's: ethnic descent or national origin, race or color, gender, age, disability

To best meet these expectations, suppliers should have formal policies that prohibit harassment and discrimination and should periodically review hiring and promotion practices to ensure fair treatment

7.4 Anti-harassment

FSS is committed to a working environment which is free from harassment, including discrimination, victimization and bullying, and in which dignity of the individual is paramount. As such, all Suppliers are responsible for helping to ensure that individuals do not suffer any form of harassment

7.5 Wages and hours

Suppliers must follow all applicable laws regarding working hours, wages and overtime pay. Workers must be paid at least the minimum legal wage or a wage that meets local industry standards. Suppliers should conduct operations in ways that limit overtime to a level that ensures humane and productive working conditions

Suppliers must pay overtime and any incentive rates required to meet standards. Workers should receive necessary time off, paid annual leave and holidays, as required by local laws

8. Prohibition of Nepotism

8.1 Close Personal Relationships

FSS strongly discourages amongst its Vendors and Suppliers Nepotism in their recruitment and hiring processes. FSS construes "close personal relationships" as relationships between immediate family members, spouses, fiancés, children, grandchildren, siblings, parents, grandparents, aunts, uncles, nieces, nephews, and their respective spouses and any other relationships that reasonably might be perceived as potentially compromising the Vendors and Suppliers ability to make independent, unbiased decisions.

9. Monitoring and Enforcing

While not obligated to perform investigations, in accordance with the terms of the Customer Agreement, FSS Group may:

- Investigate violations of this Policy
- Investigate and help prevent modern slavery where it believes it is occurring.
- Suspend or terminate contracts of those vendors or suppliers where FSS Group have reasonable grounds to believe they are participating in human slavery practices as listed in this Policy

9.1 FSS Group Staff Responsibilities in the UK

FSS Group staff and contractors are responsible for ensuring they comply with this policy and for escalating any concerns, suspicions or incidents where they believe human trafficking/modern slavery is involved, within the UK you should do the following if you are concerned about a potential victim, or suspicious about a situation that is potentially exploitative:

Within the UK FSS Group promote the modern anti slavery NGO "Unseen." www.unseen.org

- call the [Modern Slavery Helpline](tel:08000121700) on 08000 121 700 or [submit a report online](https://www.unseen.org/submit-a-report). The helpline is operated by Unseen, open 24/7 and entirely confidential. Their specially trained advisors can take details of your concerns and pass them

on to the most appropriate agency to ensure victims are safeguarded and supported as quickly as possible.

- If you believe a person is being trafficked and is in **immediate danger**, within the UK you should **call 999** straight away.
- Within the UK you can also report suspicions of trafficking by calling 101 or visiting your local police station.
- You can also contact [Unseen's RIO Team](#) for advice about a potential victim and the services available in the South West.

9.2 FSS Group Staff Responsibilities outside of the UK

FSS Group staff and contractors are responsible for ensuring they comply with this policy and for escalating any concerns, suspicions or incidents where they believe human trafficking/modern slavery is involved. Outside of the UK you should do the following if you are concerned about a potential victim, or suspicious about a situation that is potentially exploitative:

- Gather as much information as you can about the situation without exposing yourself to personal risk.
 - Names, Contact details, vendor or supplier of concern.
 - Time and place of the incidents or concerns.
 - What it is that is concerning you.
- Report the information to your FSS Group Project or Line manager for further escalation

9.3 Modern Human Slavery Staff Training

During FSS Group induction you will be required to participate in the presentation relating to modern human slavery. This induction module is compulsory and supplier, employee or consultancy contracts can be issued until participation is completed and filed in the HR file of Onboarding File of the individual or entity.

10. Suppliers and Staff who become involved with Human Trafficking/Modern Slavery

10.1 Vendors and Suppliers

Where FSS Group in their sole belief have reasons to believe that their Vendors or Suppliers are involved with modern human slavery the vendor or supplier will have their services terminated and will be reported to their respective host police force.

10.2 Contractors and Employees

Where FSS Group in their sole belief have reasons to believe a Contractor or employee is involved with modern human slavery they will initially be suspended pending FSS Group HR process is followed. Contractors and employees are reminded that participation in human slavery is illegal and could result in the following.

- Summary termination of their employment or consultancy contract in a formal disciplinary hearing.
- Evidence gained by FSS Group being passed to the relevant law enforcement agency.

11. Hiring of Local Staff

Staff hire is only authorized via the FSS Group project manager for the project being delivered. Local national hires can only be recruited by use of approved local hiring companies that are registered as labour brokers or recruitment agencies in their home country. These will be vetted and contracted by FSS Group Procurements & Contracts Department.

Only formally and legally registered and licensed local companies can become vendors or suppliers to FSS Group after they have completed vendor due diligence and "on boarding" process. This is controlled by FSS Group Procurements & Contracts Department.



FSS GROUP
GLOBAL RISK MANAGEMENT

ANDREW MELVILLE MM

Managing Director

January 2021

Reference: This statement has been produced pursuant to the Modern Slavery Act 2015 (UK).

FSS MODERN SLAVERY STATEMENT

Introduction

The Modern Slavery Act 2015 (UK) made it a legal requirement for companies like Field Support Services Group Ltd to be socially responsible and protect the human rights of workers. Alongside our legal obligations, our core corporate beliefs include a respect for the rule of law, promoting liberty, enterprise and democracy. To adhere to these beliefs and the law, we must take responsibility for individuals that work with and for us. This statement sets out the action we have taken during 2019, aimed at ensuring that our corporate activities and supply chains are free from modern slavery and human trafficking.

Our business and supply chains

The FSS Group of companies are a group of international security and risk management companies employing a workforce of permanent employees and contractors with diverse skill sets. Its core business is the delivery of security and risk management services in developing and high risk countries: www.fieldsupportservicesgroup.com

We are based in the UK and have a wide range of global clients spanning a range of sectors including mining, defense, NGO and corporate. Our operations include provision of high quality consultants, escort, guarding and light logistic services.

Policies and Processes

We strive to maintain the highest standards of conduct and ethical behaviour from our employees, contractors and our suppliers:

Policies: We have a wide range of policies relating to modern slavery which we have embedded in our Staff Handbook. These make it clear what behaviour is expected of our employees and contractors in respect of modern slavery.

Whistleblowing: Our whistleblowing policy encourages our employees, customers, business partners and suppliers, to report any concerns, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Due Diligence: Suppliers must complete our due diligence process, including agreeing to our "Supplier Business Code of Conduct" before they do business with us. This sets out our requirements that Suppliers provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We undertake a higher level of due diligence, if there is a higher risk of modern slavery.

Monitoring: We are continually evaluating modern slavery and human trafficking risks for our suppliers and have identified those where there is a higher potential for modern slavery. The areas of enhanced risk are monitored by our procurement and compliance teams. Within our flow down contracts are clauses that state our anti-slavery requirements which legally bind our suppliers.

Training and Awareness: We currently cover our modern slavery obligations as part of our induction training where we raise awareness of modern slavery issues generally and reiterate to our staff and contractors the importance of our Supplier Business Code of Conduct. This statement has been approved by the organisation's Board of Directors, who will review and update it annually.

We know that to tackle modern slavery, and promote our core beliefs it is essential to monitor and improve our procedures on an on-going basis, and we review those processes annually.

Please do not hesitate to contact me if you need any more information.

Yours faithfully

A handwritten signature in black ink, appearing to read "A Melville". The signature is written in a cursive, slightly slanted style.