



MAN COMMERCIAL PROTECTION LIMITED

ANTI SLAVERY & HUMAN TRAFFICKING POLICY

Approved by:

**I. McCallister Chief Executive
Officer (CEO)**

Date

January 2024

1.0. INTRODUCTION

MAN Commercial provides a responsible and professional manned guarding service to the retail, commercial, logistic, construction, industrial, entertainment and public sectors. The company also provides a key holding and alarm response service as well as Public Event Security (Crowd Control). The company has been certified to ISO 9001, ISO 45001, ISO 14001 and ISO 50001; is a member of the British Security Industry Association (BSIA); Approved Status with the Security Industry Authority (SIA) and has regular liaison with local police forces.

Industry Sectors

Specific industries with which MAN Commercial is involved are:

- *Facilities / Property Management Companies; securing office complexes, Business Parks, Shopping Centre's, etc.*
- *Logistic / Distribution Centre's and Warehousing.*
- *Central and Local Government Projects.*
- *Concierge Staff for the Corporate Sector.*
- *Construction Sites.*
- *Industrial Sites (Gatehouses).*
- *Entertainment Sector - Event Security.*

1. POLICY STATEMENT

- 1.1** The MAN Commercial code of conduct sets out the minimum behavior we expect from our employees and supply chain partners. This policy deals with the specific issues associated with modern slavery and human trafficking.
- 1.2** Modern slavery is a crime and a violation of an individual's fundamental human rights. Modern slavery can take various forms, such as, servitude, forced or compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within the business MAN Commercial or in any of our supply chains.
- 1.3** MAN Commercial are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all contractors, suppliers and other business partners, and as part of our contracting processes, we will include specific prohibitions concerning modern slavery, whether of adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. MAN Commercial's approach will be to work with our supply chain partners to improve performance standards. Should these standards not be met the service or relationship would be ceased with immediate effect.

All commodities sourced are 100% compliant with MAN Commercial's standards for responsible, social and environmentally friendly procurement. Any labour providers used are expected to adhere and comply with this policy.



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2. WHO DOES THIS POLICY APPLY TO?

- 2.1** This policy applies to all staff, including full and part-time employees along with temporary staff. It also applies to agents, contractors and other third parties acting on our behalf in any capacity.
- 2.2** This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. RESPONSIBILITY FOR THE POLICY

- 3.1** The CEO of MAN Commercial Protection Ltd holds overall responsibility for ensuring this policy complies with our legal and ethical obligations.
- 3.2** The Company's management team, has primary and day-to-day responsibility for implementing this policy, monitoring its uses and effectiveness, dealing with any queries in relation to the policy and engaging audit resource to audit internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3** Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on the policy and the issue of modern slavery in supply chains.

4. COMPLIANCE WITH THE POLICY

- 4.1** You must ensure that you read, understand, and comply with this policy.
- 4.2** The prevention, detection and reporting of modern slavery in any part of our businesses or supply chains is the responsibility of all of us.
- 4.3** You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.4** You are expected to report as soon as possible:
- whether you know or suspect any instance of modern slavery is occurring in any part of our businesses or within supply chains*
 - whether you know or suspect a breach of this policy is/has occurred to your line manager, or a member of the management team.*
- 4.5** If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any of our businesses or supply chains constitutes any of the various forms of modern slavery, raise it with your line manager, or a member of the senior management team.
- 4.6** MAN Commercial are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our businesses or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the independent advisor named below.



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5. COMMUNICATION AND AWARENESS OF THIS POLICY

- 5.1** Regular training will be given on this policy along with Risk Assessments to identify any risks our businesses face from modern slavery in its supply chains will be provided as necessary.
- 5.2** Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. BREACHES OF THIS POLICY

- 6.1** Non- compliance with this policy by employees may result in disciplinary action up to and including summary dismissal, and by contractors, agents or other third parties working on our behalf, in termination of contract.

7. FURTHER INFORMATION

- 7.1** If you have any queries regarding this policy, please discuss with your line manager.

8. HOW TO RAISE A CONCERN

- 8.1** If you have a concern or suspect a violation of this policy, we want you to speak up immediately. Speaking up can be a difficult thing to do, so be reassured that all information received will be treated seriously and investigated appropriately. If you act in good faith, believing your information is accurate; we will protect you even if you are wrong. Some concerns can be addressed by speaking to the person whose conduct is the cause for concern. We understand that this is not always possible, so we suggest that you speak to your line manager. If, for whatever reason, you do not feel comfortable doing this, you can contact any member of Human Resources or Senior Management.

If you have any concerns about making a report in line with this policy within the company, alternatively in full confidentiality you can contact UK Slavery Helpline on 08000 121700.