

Modern Slavery Policy

This policy was approved by the Board of Directors of VPS Holdings Limited (the **Company**) on 04 April 2024 and applies to the Company and each of its parent, holding and subsidiary companies (together, the **VPS Group** or **VPS**). For the avoidance of doubt, the policy applies to:

- The VPS Group's subsidiaries in the UK and Ireland, including, but not limited to, VPS (UK) Limited, VPS Site Security Limited, M&R Solutions Limited, Evander Glazing and Locks Limited, VPS Guardians Limited, VPSitex NI Limited, VPSitex Ireland Limited, Durus Security Limited and Tyrion Security Bidco Limited; and
- The VPS Group's subsidiaries outside of the UK and Ireland, including, but not limited to, VPSitex Holdings Netherlands BV, FMT Beheer BV, VPS Site Security Nederland B.V., VPSitex Deutschland GmbH, VPSitex Italia SRL, VPSitex España SLU, VPSitex Holdings SAS, VPSitex SAS, Prodomo SAS, VPS Résidents Temporaires SAS, and Durus Sécurité SAS, save that if the applicable local legislation or any local company policy provides stronger protection in connection with modern slavery, then the terms of the local legislation and/or policy will take priority over the terms of this policy.

1. About this policy

The purpose of this policy is to set out the VPS Group's commitment to mitigating the risk of any modern slavery, forced labour and human trafficking (together, **Modern Slavery**) in the VPS Group.

Please note that you may also want to refer to the following VPS policies:

- Anti-bribery and Corruption Policy (Group)
- Whistleblowing Policy (Group)
- Code of Conduct (Group)
- Data Protection Policy (Group)

This policy does not form part of any employee's contract of employment, and the VPS Group reserves the right to amend it at any time in its sole discretion.

The Group Legal Department has overall responsibility for ensuring this policy complies with our legal obligations. In the UK, the relevant Procurement Department (Group, Evander, UK&I Security Services, Nexus) has primary responsibility for auditing internal control systems and procedures to ensure they are effective in countering Modern Slavery in our supply chain. While there is not currently legislation equivalent to the UK Modern Slavery Act 2015 in each of the countries in which the VPS Group operates, the employees with supply chain responsibility in each of the VPS Group's subsidiaries outside of the UK have primary responsibility for auditing internal control systems and procedures to ensure they are acting in compliance with this policy.

2. Who must comply with this policy

This policy applies to all persons working for the VPS Group or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors and sub-contractors, external consultants, third party representatives, or any other person associated with the VPS Group. In this policy, all such persons will be referred to as “you”.

3. Preventing Modern Slavery

Modern Slavery can take various forms, all of which include the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

The following list provides some examples of Modern Slavery (but please note that this is not an exhaustive list):

- failing to pay employees and workers in accordance with the applicable national minimum wage;
- making any unlawful deductions from employee’s wages;
- requiring employees to work excessive hours which do not conform to local or national laws;
- forcing employees to work overtime, or any other form of forced, non-voluntary work;
- failing to provide a suitable and safe working environment for employees; and / or
- employing workers who are under the legal minimum age of employment.

The VPS Group is 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 in our operations.

We are committed to ensuring our employees are paid correctly, on time and in full, in accordance with the relevant national laws in place. Where required under local legislation, HR will conduct checks on an employee’s right to work in the relevant country in which they are based.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains. We require the same high standards from all of our contractors, suppliers and other stakeholders. We conduct due diligence on companies within our supply chain (including checks on their Modern Slavery policies and practices at the supplier on-boarding stage in the UK). In the UK we also include obligations relating to Modern Slavery compliance in our standard supplier contracts. To help ensure that these obligations are met, we engage with suppliers on Modern Slavery issues, particularly those suppliers that we categorise as potentially higher-risk with regards to Modern Slavery. Should any checks identify non-compliance with our Modern Slavery obligations, the supplier will be required to provide a remedial plan, and if any areas of non-compliance are not resolved to our satisfaction, we reserve the right to terminate that supplier relationship.

In addition, we comply with our legal obligation in the UK to produce an annual Modern Slavery statement and this is published on our website. As part of this process, we conduct an annual review of any Modern Slavery risks which we believe are present within our business activities and supply chain and ensure these risks are eliminated or mitigated.

The prevention, detection and reporting of Modern Slavery in any part of VPS's business or supply chains is the responsibility of all those working for VPS or under our control. You are therefore required to avoid any activity that might lead to, or suggest, a breach of this policy.

4. Reporting concerns about Modern Slavery

Everyone within the VPS Group has a responsibility to be alert to the risks, however small, of Modern Slavery within our business or in our wider supply chain. You are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chains at the earliest possible stage. If you believe or suspect a breach of this policy has occurred, or may occur, you must notify the Director of Information Security, Risk & Governance (please refer to the Appendix for contact details) or in the case of third parties, your normal VPS contact as soon as possible. You can also report it in accordance with our Whistleblowing Policy. If you are unsure about whether a particular act, matter or issue constitutes Modern Slavery, but remain concerned that it may represent a breach of this policy, please still report it in the same way.

VPS encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. VPS guarantees that no one will suffer 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 own business or in any of our supply chains.

5. Breaches of this policy

Any employee who breaches this policy may face disciplinary action. We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6. Review of this policy

This policy will be reviewed by the VPS Group on an annual basis to ensure it is up to date and achieving its aims.



Lee Newman
Group Chief Executive Officer
VPS Group

Appendix

Contact Details

Director of Information Security, Risk & Governance

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