

Anti-Slavery Policy

General

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we 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 in our own business or in any of our supply chains.

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, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, security officers, agency workers, external consultants, and business partners. The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Compliance Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. 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 it and the issue of modern slavery in supply chains.

Obligations

All directors, security officers, agency workers, external consultants and business partners must ensure that they read on induction from in the handbook, understand and comply with 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. You are

required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager or the compliance as soon as possible if you believe or suspect that a

conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistle blowing Policy as soon as possible. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the compliance officer. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because 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. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform Compliance Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure with the Managing Director immediately who will raise an internal non-conformance and address within an agreed acceptable timescale. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach any part this policy and report them to SIA (security personal).

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Cava Security Services Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Due Diligence

Cava Security Services Ltd undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers, the due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through [third party auditor] and requiring them to implement action plans if needed.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Staff awareness

As well as training staff, the organisation has raised awareness of modern slavery issues by including Anti- Slavery policy and whistleblowing Policy within the employee handbook.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy** Cava Security Services Ltd encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** Cava Security Service is an Approved Contractor Scheme (ACS) company that provides a recognised hallmark of quality within the private security industry SIA code of conduct makes clear to all employees/ACS approved contractors the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Ethical Procurement policy** Ethical principles on behalf of our suppliers are one of our top priorities at Cava Security Services Ltd; in turn we demonstrate the highest level of ethical principles ourselves. We are fair in our procurement dealings and avoid any adverse conduct. Our suppliers have to ensure that they treat their employees ethically. Wages paid for a standard working week need to meet or exceed national (or, where applicable, local) legal standards.
- **Suppliers of Code Practice for the provision of labour in Security and Events** The procurement of additional labour if needed to support service delivery in the security guarding and events management sectors will be professionally managed by Cava Security Service to ensure security is not compromised.
- **Recruitment Policy:** Cava Security Services Ltd only employs people on a permanent contractual basis. Prior to commencement of employment all employees are subject to right to work, residency. Screened to the standard BS 7858:2019, This British Standard helps Cava Security to screen security personnel before they employ them. It gives best-practice recommendations, sets the standard for the security screening of staff in an environment where the safety of people, goods or property is essential. This includes data security, sensitive and service contracts, and confidential records. It can also be applied to situations where security screening is in the public's interest. It sets out all the necessary requirements to conduct a security screening process. It covers ancillary staff, acquisitions and transfers, and the security conditions of contractors and subcontractors. It also looks at information relating to the Rehabilitation of Offenders and Data Protection Acts.

This statement has been approved by the organisation's board of senior directors, who will review and update it annually:

Name	Directors	Version	Reviewed
Richard Payton	Managing Directors	V3	09/10/2023
Nicola Stabbins	Commercial Director	V3	09/10/2023
Mal Ullah	Compliance Director	V3	09/10/2023
Colin Harris	Technical Director	V3	09/10/2023

Law relating to this document.

Leading statutory authority

Modern Slavery Act 2015

[Transparency in supply chains etc: a practical guide](#)

[Stronger together initiative](#)

[Ethical trading initiative](#)

[Gangmasters Licensing Authority](#)

[Global slavery index](#)

[Business and human rights resource centre](#)

[International Labour Organisation: forced labour, human trafficking and slavery](#)

[Guiding principles on business and human rights: implementing the United Nations "protect, respect and remedy" framework](#)

Name: Mal Ullah

Position: Compliance Director

Date: 09/09/2023

Signed:

Mal Ullah