Argenbright Security Europe Limited (and its Subsidiaries)

Modern Slavery and Trafficking Statement

(Applicable to all Employees)

ASEL-POL016
Version 1 / Revision 6
August 2024

Introduction

This policy covers Argenbright Security Europe Limited (13249975) and its subsidiaries, ASEL Temporary Security Solutions Ltd (03448690) and ASEL Integrated Security Solutions Ltd (10259434). All operating under the same policies, procedures, and management.
This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Argenbright Security Europe Limited (and its Subsidiaries) Limited – hereinafter "ASEL - has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ASEL has a zero-tolerance approach to any form of modern slavery and 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.

OUR BUSINESS
ASEL are an installer and maintainer of Electronic Fire & Security systems and provider of security officers throughout Great Britain. We also install and maintain CCTV systems in some European countries, including Germany, Holland, Austria and Belgium. We are also a leading provider of manned security services throughout the UK and ROI.

OUR HIGH-RISK AREAS
We have identified that there are a number of European engineers and security personnel available within the employment market, most of whom have very limited experience of UK Security Systems but are available for a reduced cost. ASEL do not see that these personnel offer either party value for money, so have introduced a policy to pay Industry Standard wages for suitably experienced engineering staff. We are also in the process of introducing a written pre-employment exam to ensure staff are considered competent prior to being offered a position within the Company.

OUR POLICIES
We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Anti-Slavery Policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. **Recruitment Policy**. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. **Whistleblowing Policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. **Code of Business Conduct.** This code explains the way we behave as an organisation and how we expect our employees and external providers to act.

OUR EXTERNAL PROVIDERS

ASEL operates an external provider policy and maintains a preferred list for key providers, and we conduct due diligence on all external providers before allowing them to become a preferred provider. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery, and on-site audits which include a review of working conditions, where deemed necessary. Our Anti-Slavery Policy forms part of our contract with all external providers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with external providers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own external providers to account over modern slavery
3. For UK based external providers, they pay their employees at least the national minimum wage/national living wage (as appropriate)
4. For international external providers, they pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to our attention

TRAINING

We regularly conduct training for our procurement teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

APPROVAL FOR THIS STATEMENT

This statement was first approved by the Board of Directors on 1st March 2023 and is reconfirmed annually.

Marc Stanton
Managing Director
March 2026