



Modern Slavery Statement

Introduction and organisation structure

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and covers the financial year ending 31 March 2021. It sets out the steps the VPS Group has taken, and is continuing to take, to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

The statement is made by VPS (UK) Limited on behalf of its UK subsidiaries (including but not limited to VPS Site Security Limited, Redfields Landscaping & Design Limited, Evander Glazing and Locks Limited, VPS Guardians Limited and VPSitex NI Limited) and in its capacity as the parent company of the subsidiaries in the UK part of the VPS Group (together, the **VPS Group**).

This statement is also made on behalf of the parent company of VPS (UK) Limited and the other UK companies within the VPS Group including Vacant Property Security Limited, VPS Holdings Limited, Tyrion Security Bidco Limited, Tyrion Security Midco Limited, Tyrion Security Debtco Limited and Tyrion Security Topco Limited.

Our business and supply chains

The VPS Group is a specialist provider of vacant, occupied and site security solutions. Our core services cover the vacant, unoccupied and void property lifecycle from an initial risk assessment, security, maintenance, cleaning and preparation.

We know that modern slavery, forced labour and human trafficking (together, **Modern Slavery**) is a global issue across all business sectors. We recognise our responsibility to implement and enforce effective systems and controls to ensure Modern Slavery is not taking place anywhere in our supply chains. We are committed to raising awareness of these issues among our people and suppliers, and also to challenging our suppliers in the effort eradicate Modern Slavery. Equally, we take our responsibility as a supplier to our customers seriously, and we are committed to supporting our customers with their own efforts to combat Modern Slavery within their supply chains.

We are aware that the risks of Modern Slavery are dynamic and can develop and change quickly, so as a business we are committed to regularly reassessing and responding to the potential and actual risks we face.

We use a carefully procured range of suppliers who supply goods that we sell or rent, provide services to us and our customers, and support the operations of our businesses. These include consultants and advisers, contractors, sub-contractors and third party suppliers of goods, products and equipment.

Our policies in relation to slavery and human trafficking

We have in place systems and policies to support our efforts to mitigate Modern Slavery in our wider business, including the following:

- Modern Slavery policy – the policy sets out our stance on modern slavery. The policy reflects our commitment to acting ethically and with integrity in all our business relationships. This policy also explains how employees can identify any instances of this and how to report concerns.
- Whistleblowing policy – we operate a whistleblowing policy so that all employees know that they can raise concerns about practices within our business or supply chain.
- Recruitment procedures – we operate robust recruitment procedures, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking. We also ensure all employees are paid, at a minimum, national legal standards, and that all employees are provided with a safe and hygienic working environment.

Due diligence processes

We also have robust procedures in place to mitigate the risk of Modern Slavery in our supply chains. In particular, thorough checks are carried out on our suppliers through a robust procurement and supplier due diligence and audit process.

We ensure that our contracts with suppliers and subcontractors contain appropriate obligations to ensure compliance with their legal obligations regarding modern slavery. We also ensure we have the right to audit compliance and we will take appropriate steps in the event we find there has been a breach of these obligations.

Steps taken and key performance indicators

As part of our ongoing initiatives to identify and mitigate risk across our business, during the past twelve months, we have taken additional steps to review and monitor our compliance with Modern Slavery legislation and to ensure that we mitigate the risk of Modern Slavery in our supply chains and business operations. These steps include the following:

- During the Covid-19 pandemic, we have at all times ensured we are operating in accordance with government guidance regarding safe working practices for our colleagues, customers and suppliers, including in our offices and depots and at any location where we are delivering services.
- We have continued, throughout the pandemic, to ensure we carry out regular reviews of our key suppliers by identifying potential risk areas. We continue to review our supplier audit processes, including for manned guarding sub-contractors.
- We have participated fully in a variety of audit processes conducted by our customers, many of which focus on Modern Slavery, and we have used these opportunities to share best practice with other organisations and to review and enhance our own processes relating to Modern Slavery.
- We will cease engaging or otherwise working with any subcontractor supplier where there are concerns regarding Modern Slavery (whether temporarily, until such concerns are resolved to our satisfaction, or permanently).
- We continue to operate robust processes for ensuring employees have the right to work, in accordance with current legislation.

- Our standard terms and conditions of business for suppliers and subcontractors have been updated and continue to include requirements to ensure compliance with all current legislation, including the Modern Slavery Act 2015 and its requirements.
- Our Whistleblowing policy has been reviewed and updated as part of its annual review process to ensure it remains fit for purpose. We continue to investigate any concerns raised under the Whistleblowing policy in accordance with its terms.
- Health and safety remains a key business focus. All internal management meetings have an agenda item to discuss health and safety, and we continue to regularly review and enhance our training and processes to ensure employees are provided with a safe working environment.

We will know the effectiveness of the steps that we are taking to ensure that Modern Slavery is not taking place within our business if no reports are received from employees or any other third parties that Modern Slavery practices have been identified, and we have not identified any areas of non-compliance with Modern Slavery obligations within our supply chain.

Training on Modern Slavery

We have identified key employees within our UK businesses (including within our HR and Procurement teams) who will be completing enhanced Modern Slavery training during the 2021-22 financial year.

The coming year

We have a zero tolerance approach to Modern Slavery, and we act ethically and with integrity in all our business relationships. Following a review of the effectiveness of the steps we have taken this year, to ensure there is no slavery in our supply chains or across our wider business operations, during the next financial year we will continue to identify and assess potential risk areas.

We will act swiftly to mitigate the risk of Modern Slavery found within the VPS Group.



Lee Newman
Chief Executive Officer and Director
VPS Group