USSE C	Universal Support Services Group Ltd	Document Reference: POL-15 Document Revision No.: 03 Issuance / Review Date: Feb-24
	Modern Slavery Policy Statement	Company Name: USSG Ltd Address: Unit B6(A),The Dresser Centre, Whitworth St, Openshaw, Manchester, M11 2NE Landline: +44 161 791 2791 Web: www.ussgl.co.uk Email: info@ussgl.co.uk Company Registration No.: 10289772

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Universal Support Services Group Ltd ('USSG' &/or 'the company') 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. USSG 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.

## **Our Business Model**

USSG provide security guarding, key holding, intruder alarm response services, facilities management, and cleaning services to both residential and commercial premises in the private and public sectors. From the outset the company set out to offer a premium service in all respects, and the growth and success of the business to date is the result of this philosophy. The company endeavours to employ only the highest calibre of experienced staff throughout the business as well as source its products and supplies responsibly.

The organisational structure of the business is that of a long serving enterprise that encourages and ensures the above philosophy is spread throughout the company and to its customers and business partners. Within the supply of our products and services there are relationships with external businesses for various sourcing at certain times of the year, which make up the supply chains within USSG.

### **Our Policies**

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

#### This Modern 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.

#### **Recruitment Procedure.**

We operate a robust recruitment process, 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.

#### 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.

#### **Our Supply Chain Management**

We are members of both nationally and internationally recognized accreditations and associations, not limited to the: SIA (Security Industry Authority), ACS (Approved Contractor Scheme), CHAS (Contractors Health and Safety Assessment Scheme), ConstructionLine, Cyber Essentials and ISO, and are therefore subject to the most rigorous annual inspections which involves various vetting procedures. The aforementioned show that USSG have demonstrated compliance with the system, and sound management of current legislation.

We internally review our supply chain to evaluate human trafficking risks and anti-slavery risks and we conduct supplier audits which review all aspects of the supply chain including our supplier's stance and due diligence procedure/s pertaining to safety, human trafficking, child labour, staff recruiting and other legal requirements.

We are aware that any imported products from sources outside of the UK and EU are potentially more at risk for anti-slavery / human trafficking issues. The level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in slavery or human trafficking

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The company operates procurement procedures and maintains an Approved Supplier List. We conduct due diligence on all suppliers before allowing them to become an approved supplier. We require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery

## Training

We regularly brief all relevant management and staff members, and ensure that our policies reach every employee, in order that they understand the signs of modern slavery and what to do if they suspect that there is any risk of it taking place within any area of our business or our supply chain.

### Demonstration of our Commitment

USSG is committed to driving out acts of modern-day slavery from within its own business and that from within its supply chains. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

The Company Directors and Senior Management shall take the responsibility for implementing this policy statement and its objectives, and where necessary we shall provide adequate resources (training etc.) and investment to ensure that slavery and human trafficking is not taking place within the company or its supply chains.

# **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.
- We achieve a level of communication and personal contact with every employee and their understanding of, and compliance with, our expectations regarding modern slavery.

USSG will make this Policy available to all stakeholders, shareholders, staff, and general public on request.

The Managing Director shall review this policy annually and/or following significant changes.

## This Policy document has been approved by the USSG Managing Director

Mr Alí Naveed Ul Zafar Araín

# Mr Ali Arain Managing Director

This policy is reviewed as per the Header