



Modern Slavery and Illegal Workers Policy



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Smart Sec Solutions Ltd
Modern Slavery and Illegal Workers Policy
Approved by: Managing Director
Review Cycle: Annually

Section 1: Scope

This policy applies to Smart Sec Solutions Ltd and all individuals working on its behalf, including directly employed staff, security officers, reception personnel, supervisors, managers, service partners and all suppliers engaged in the provision of goods and services. It applies across all operational sites and client assignments within London and the Home Counties.

Section 2: Commitment

Smart Sec Solutions Ltd is committed to conducting all business activities ethically, transparently and in full compliance with applicable legislation relating to modern slavery, human trafficking and illegal working. Although the organisation does not meet the statutory threshold for mandatory reporting under Section 54 of the Modern Slavery Act 2015, it fully endorses the Act's principles and applies equivalent standards across its operations and supply chains.

The company recognises that the security and reception services sector carries inherent labour and supply chain risks and therefore maintains a zero-tolerance approach to any form of exploitation, forced labour or unlawful employment practice.

Section 3: Governance and Responsibility

Ultimate responsibility for this policy rests with the Directors and Senior Management of Smart Sec Solutions Ltd, who ensure that sufficient resources, oversight and governance structures are in place to support compliance. Operational responsibility for implementation and ongoing monitoring is delegated to the Human Resources Department, which maintains control over recruitment, vetting, compliance checks and audit activity.

All employees are required to comply with this policy as part of their terms of employment. There is an expectation that all staff remain alert to indicators of modern slavery or illegal working and escalate concerns promptly through defined internal reporting channels.

Section 4: Risk Management and Due Diligence

The company acknowledges that modern slavery risks may exist within complex labour markets and supply chains, particularly in sectors involving outsourced goods, uniforms, equipment procurement and temporary labour supply.

Smart Sec Solutions Ltd applies proportionate due diligence measures to identify, assess and mitigate these risks. This includes supplier screening, verification of ethical standards, and ongoing monitoring of higher-risk categories. The company will not knowingly engage with any organisation involved in or associated with forced labour, servitude or human trafficking.

Section 5: Recruitment, Vetting and Security Screening

Smart Sec Solutions Ltd maintains a rigorous recruitment and vetting framework to ensure that all personnel deployed in core and cover roles are suitably qualified, reliable and fully compliant with legal, regulatory and industry standards. This framework is overseen by the Human Resources Department and is fully aligned with the Immigration, Asylum and Nationality Act 2006, the Immigration Act 2014, BS7858 vetting standards, Security Industry Authority licensing requirements and ISO 9001 quality management principles.

All candidates undergo structured screening prior to engagement. This process includes identity verification and full right-to-work checks in accordance with UK immigration legislation. A complete five-year address and employment history is obtained and verified to establish integrity and continuity of employment history suitable for security-sensitive roles.

Further screening includes global watchlist checks, sanctions screening, fraud risk assessment and financial integrity checks where appropriate. Criminal record checks are conducted in line with role requirements, including DBS or Enhanced DBS verification where applicable.

All security personnel must hold valid SIA licences relevant to their role, which are verified prior to deployment and monitored throughout employment. Where applicable, CCTV licensing requirements are also confirmed. Health declarations are completed post-offer to confirm fitness for duty.

The company also undertakes structured telephone screening and online vetting as part of its selection process. This may include a proportionate review of publicly available digital presence, where relevant to suitability for a security role. Where individuals join via TUPE transfer arrangements, they are fully integrated into the same vetting framework to ensure consistency of standards across the workforce without exception.

To enhance verification integrity, additional checks may be undertaken using recognised document authentication methods, including liaising with issuing authorities and using specialist verification tools. The organisation maintains a pre-vetted pool of cover personnel to ensure continuity of service delivery. Where cover staff are deployed, assignment instructions and handover processes are applied to ensure seamless operational continuity and maintenance of client service standards.

All operatives are required to engage in ongoing professional development, including Health, Safety, Quality, and Environmental training, to ensure continued competence and compliance throughout their employment.

Section 6: Illegal Working and Immigration Compliance

Smart Sec Solutions Ltd fully complies with the Immigration, Asylum and Nationality Act 2006 and associated UK Visas and Immigration guidance. The company ensures that no individual is employed unless they have been confirmed as legally entitled to work in the United Kingdom.

Right to work checks are applied consistently and fairly to all applicants, without discrimination or assumptions based on nationality, appearance or background. Where permission to work is time-limited, follow-up checks are conducted to ensure continued legal compliance throughout employment.

All documentation is securely retained for a minimum of two years following the end of employment in accordance with statutory requirements.

Section 7: Training and Awareness

All employees receive induction training which includes awareness of modern slavery risks, indicators of exploitation, safeguarding responsibilities and internal reporting procedures. Additional training is provided to managers, supervisors, HR personnel and procurement-related roles to strengthen organisational awareness and control.

The company ensures that its commitment to preventing modern slavery is communicated to employees, suppliers and business partners at the outset of relationships and reinforced as appropriate throughout engagement.

Section 8: Reporting and Whistleblowing

Smart Sec Solutions Ltd promotes a culture of openness and accountability. All employees are encouraged and expected to report any concerns relating to modern slavery, human trafficking or illegal working at the earliest opportunity.

All reports are treated seriously, investigated appropriately and handled in confidence where possible. The company is committed to ensuring that no individual suffers any form of detriment, victimisation or retaliation as a result of raising a concern in good faith.

Section 9: Suppliers, Contractors and Agency Workers

The company expects all suppliers, contractors and employment agencies to operate in full compliance with the Modern Slavery Act 2015 and all relevant employment legislation. As part of its procurement and supplier management processes, Smart Sec Solutions Ltd conducts appropriate due diligence and reserves the right to terminate relationships with any organisation found to be in breach of ethical employment standards.

Smart Sec Solutions Ltd does not utilise agency workers. Where the company engages suppliers or service partners in the provision of services, those organisations are required to comply with the same vetting, right to work and ethical employment standards as set out within this policy, including alignment with BS7858 where applicable, ensuring consistent standards across all personnel associated with service delivery.

Section 10: Monitoring, Compliance and Performance

The effectiveness of this policy is monitored through internal audit activities, recruitment compliance checks, investigations of reported concerns, and ongoing reviews of supplier relationships and operational practices.

Where breaches of this policy are identified, the company will take appropriate action, which may include disciplinary measures up to and including dismissal, termination of contracts, or removal of suppliers and contractors from approved status.

The policy is supported by the organisation's ISO 9001-certified Quality Management System, which ensures structured oversight, continuous improvement, and documented control of key processes.

Section 11: Review and Approval

This policy is reviewed annually by Senior Management and, where required, updated to reflect changes in legislation, industry standards, or operational requirements. All employees are required to read, understand and comply with the policy in full.

Document Approval and Authorisation

Document Title: Modern Slavery and Illegal Workers Policy

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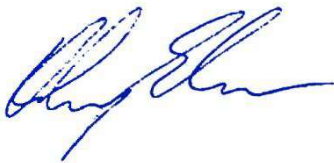
Review Date: 05/03/2027

Document Owner: Dele Ogunlaru, Operations Director

This Modern Slavery and Illegal Workers Policy has been reviewed and formally approved at the Director level. By signing below, the undersigned confirms that this document is authorised for implementation and will be maintained in line with organisational governance requirements.

Approved by:

Helmey El-Aasar,
Managing Director

A handwritten signature in blue ink, appearing to read 'Helmey El-Aasar', written over a horizontal line.

Date: 05/03/2026