



Modern Slavery and Human Trafficking Statement – 2024

INTRODUCTION

The Corps of Commissionaires Management Limited and its subsidiary companies of Corps Security (UK) Ltd and Corps Monitoring Ltd are committed to driving out acts of modern-day slavery from within its own business and that from within its supply chains.

This statement provides details on the following:

- The organisations' structure, its business, and its supply chains.
- Its policies in relation to slavery and human trafficking.
- The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.
- Its due diligence processes in relation to slavery and human trafficking in its business and supply chains
- Its effectiveness in ensuring that slavery and human trafficking are not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate and
- The training about slavery and human trafficking that is available to staff.

This statement sets out the steps we have taken during the financial year ending 31 March 2024 to ensure that slavery and human trafficking is not taking place in our business or supply chains.

The organisations' structure, business, and supply chains

The parent company of the Corps of Commissionaires Management Ltd is Corps of Commissionaires Trustees Limited, they hold the assets of Corps Security (UK) Ltd and Corps Monitoring Ltd which are trading names.

All trading entities are covered by this statement.

Corps of Commissionaires Trustees Ltd

Corps of Commissionaires Management Ltd

Corps Security (UK) Ltd

Corps Monitoring Ltd

We are the oldest security company in the world and were founded in 1859 by our founder Captain Sir Edward Walter who had a mission to provide gainful employment to service personnel returning from war.

We now employ over 3000 people and are a leading supplier of specialist security services across the United Kingdom. We continue to develop our security services by adding real value and professionalism to the management and staffing of receptions, mailrooms, switchboards, data entry, site maintenance and other services.

We use a range of skilled subcontractors and suppliers to assist in our delivery of high-quality security solutions to our clients.

Policies in relation to slavery and human trafficking

We have a set of policies and procedures covering human rights in general and specifically addressing relevant areas to minimise the risk of slavery or human trafficking occurring in our business or supply chains.

These include, but are not limited to:

Modern Slavery Policy, Code of Ethics and Business Conduct, Colleague Handbook, Recruitment and Selection Policy, , and our Whistleblowing Policy

These policies are subject to regular review to ensure they reflect both statutory obligations and best practice.



Our **Modern Slavery Policy** covers our responsibilities, our procedures, risk, identifying and reporting slavery.

Our **Code of Ethics and Business Conduct** set out the ethical standards which must be upheld by our colleagues across our business.

Our **Colleague Handbook** is a summary of terms and conditions of employment and other useful information. It lists our values, colleague, customer and equality, diversity and inclusion charters promoting the phrase that “Everyone Matters”.

Our **Recruitment and Selection policy** also forms part of our colleague handbook and describes our principles and best practice of effective recruitment and selection and ensures that legal standards are consistently met and exceeded.

Our **Whistleblowing Policy** sets out our commitment to providing the highest level of service to our customers and to applying the highest standards of quality, integrity, openness, and accountability, it details how to report a concern internally and externally.

All our policies are available to colleagues on our company intranet.

Parts of business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps taken to assess and manage that risk.

We thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced and expect our suppliers to have the same standards that we do, and we are not prepared to accept any form of exploitation.

We believe that services reliant on relatively low-paid labour are our greatest risk in the supply chain, examples we are aware of are:

Supply chains - subcontracted work where workers are working under student visas and vulnerable to visa conditions, non-compliance of minimum wage requirements, excessive working hours, overtime rates not in line with contract, in addition to workwear and uniform imported from outside the UK and general recruitment.

We recognise that collaboration throughout our supply chain is needed to prevent such issues from arising.

We actively promote safe and fair working conditions, including the responsible management of environmental and social issues within our supply chain.

Due diligence processes in relation to slavery and human trafficking in its business and supply chains

Our suppliers undergo an on-boarding process which is continually reviewed and sets out our key requirements for our suppliers, this includes a pre-qualification assessment containing an anti-slavery clause.

This clause, flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery and human trafficking.

We ensure that we can account for each step of our supply processes for example we know who is providing goods and services to us and we have mechanisms and processes in place to check, including:

1. Pre-qualification assessments and written contracts
2. Risk assessments and physical visits to suppliers.
3. Key performance indicators (KPI's)
4. Maintaining an Approved Supplier Database

We continue to analyse our supply chain for potential risk in the light of changes which impact our business, our suppliers, and our sector.

If any weakness in process or governance are identified, we will seek to agree a detailed plan of action with the supplier and could result in the termination of our contact with them.

Effectiveness in ensuring that slavery and human trafficking are not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.

All suppliers undergo onboarding, they complete pre-qualification assessment questionnaire and supply documents which are further assessed by our Compliance Team.

Our pre-qualification assessment questionnaire includes an anti-slavery clause and once all due diligence has taken place our suppliers will then sign a further Terms and Conditions document before they are added to our approved supplier's database.

We use several key performance indicators to measure how effective we have been in communicating awareness of our core policies and procedures related to the requirements of the Modern Slavery Act 2105 and our other actions to ensure that slavery and human trafficking is not taking place in any of our business or supply chains.

The KPIs used to measure against will be subject to ongoing review by our Senior Management and Compliance Teams to ensure their continued effectiveness.

Training about slavery and human trafficking that is available to staff.

We continue to provide specialist training to those colleagues who are involved in managing recruitment and our supply chains.

More general awareness training and information is provided to all colleagues and available to download from our company intranet.

We strengthen employee awareness by promoting regular blogs on the issues involved, be more aware of the risks, the signs to be vigilant and how to raise awareness should they see or fear something is suspicious.

We believe that improved awareness is one of our most effective methods to reduce the risk of slavery and human trafficking.

Our commitment

This statement has been written in accordance with the requirements of the UK modern Slavery Act (2015) and aligning to the Ethical Trading initiative – Modern Slavery Framework.

This is our slavery and human trafficking statement for the financial year ending 31 March 2024 as approved by our Board of Directors.

This statement will be reviewed annually and published.

Name: Dewi Lynn Thomas

Role: Company Secretary

Signature:



Date: 02 April 2024