



## Universal Security Policy Document

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Author	Alan Stokes

### Revision Control

Version	Revision Date	Summary of Change	Author
0	15 <sup>th</sup> Nov 2016	Policy Endorsement Date	Richard Bedford
0	9 <sup>th</sup> October 2017	Document Review	Kelsey Williamson
1	5 <sup>th</sup> April 2018	Document Rewritten	Alan Stokes
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2	18 <sup>th</sup> Sept 2020	Document Audit and Update	Kelsey Williamson

### Sign Off

Name	Position	Signature	Date
James Crouch	Director		18 <sup>th</sup> September 2020
Alan Stokes	Commercial Manager		18 <sup>th</sup> September 2020



## **The Modern Slavery Act 2015** (*Laid down by the Secretary of State in the 2015 Act*)

The Act requires companies to produce a Modern Slavery and Human Trafficking Statement for each financial year. Universal Security Systems Ltd (USS) will verify compliance with our subcontractors and supply chain accordingly and will continue to be compliant with the requirements of the Act.

USS install and maintain industrial, commercial and residential security systems and by the nature of the business operations are unlikely to be non-compliant with the Act at any time.

In response to the Government's requirements USS fully supports the concept of transparency in Supply Chains and will implement the following:

### **1. Compliance with Anti-Slavery and Human Trafficking Laws and Policies**

Universal Security Systems Ltd shall:

- a) Comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including the Modern Slavery Act 2015
- b) Have and maintain our own policies and procedures to ensure its compliance
- c) Not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015
- d) Include in its contracts with its direct subcontractors and suppliers anti-slavery and human trafficking provisions that comply with the Act
- e) Provide employees with adequate, appropriate awareness of modern slavery and human trafficking
- f) Publish this statement in a prominent place on our website's homepage and include a document link
- g) Gain approval of this statement by our Board of Directors and signature of acceptance

### **2. Due Diligence**

USS shall implement due diligence procedures for its subcontractors and suppliers and other participants in its supply chain, to ensure that there is no slavery or human trafficking.

USS accepts its responsibility to ensure that:

- a) Our responses to the Customer's slavery and human trafficking due diligence questionnaire are complete and accurate
- b) As reasonably practicable its employees, subcontractors and supply chain:
  - i. Has been convicted of any offence involving slavery and human trafficking
  - ii. To the best of our knowledge, has not been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.



### 3. Notification

USS shall notify the Customer as soon as it becomes aware of:

- a) Any breach, or potential breach, of its anti-slavery and human trafficking policies and procedures
- b) Any actual or suspected slavery or human trafficking in a supply chain

### 4. Audit

USS shall:

- a) Permit the Customer and its third party representatives, on reasonable notice during normal business hours, but without notice in case of any reasonably suspected breach of compliance to have access to and take copies of the USS's records and any other information and to meet with the USS's personnel to audit USS's compliance with its obligations
- b) Implement an annual audit of the organisation, our subcontractors and suppliers with regards to compliance with anti-slavery and human trafficking laws, either directly or through a third-party auditor.

**James Crouch**  
Director