

Form No.	HR-POL-47		Last Review	Dec 2024
Revision	2021 V4		Reviewed By	J Hulme

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made in relation to the Modern Slavery Act 2015 and sets out the steps that Marlowe Fire & Security Group has taken and is continuing to take to ensure that modern slavery nor human trafficking is and will never take place within our business or supply chain to the best of our ability.

Modern slavery consists of slavery, human trafficking and forced labour. All Marlowe Fire & Security Group companies have 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.

This policy applies to the following business entities grouped under Marlowe Fire & Security Group:

### MARLOWE FIRE & SECURITY

The Company are highly experienced in providing maintenance and installation of both fire and security systems. This includes security systems, fire protection, electrical services, and offsite monitoring. All services are provided nationwide with the assistance of our large national fleet of multidiscipline engineers and our five regional offices.

Marlowe Fire & Security Group operates within both the domestic sector as well as the business sector, providing the Company with a large and extensive portfolio. Marlowe Fire & Security Group have several large suppliers including Gent by Honeywell, Galaxy, DualCom and others, giving us over 200 suppliers who provide high quality products.

### HIGH RISK AREAS

Due to the industries Marlowe Fire & Security Group resides within, the highest risk the business has to modern slavery is its supply chain, more specifically either the subcontractors or suppliers. For this reason, all suppliers and subcontractors must complete a questionnaire which goes into detail regarding modern slavery. Once complete, Marlowe Fire & Security Group reviews the completed questionnaire with the evidence they submit as well as carry out the background checks linked with the due diligence.

### ASSOCIATED POLICIES & PROCEDURES

Marlowe Fire & Security Group operates through several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- HR-POL-04 – Recruitment Policy: We operate a strict recruitment policy, including eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- HR-POL-09 – Equality & Diversity Policy: We operate a well guided equality and diversity policy to ensure that all individuals have treated them same without prejudice and to eliminate any unfair treatment within our business that relates to equality and diversity.
- HR-POL-17 – Ethical Trading Policy: We operate a very firm ethical trading policy to ensure that we not only obtain the high-quality product we communicate to our customers, but to also ensure that no modern slavery is taking place within our supply chain.
- HR-POL-23 – Whistle Blowing Policy: We operate a whistle blowing 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.

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## MARLOWE FIRE & SECURITY LTD.'S SUPPLIERS

Marlowe Fire & Security Group operates an ethical trading policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier, including DBS checks where appropriate and other searches from publicly available data to ensure the supplier has not been convicted of offenses relating to modern slavery.

As well as this, suppliers must complete an in-depth questionnaire to ensure any discrepancies are highlighted. Our supplier questionnaire requires the supplier to confirm that they are not taking part in any form of modern slavery.

In addition to the above, as part of our suppliers, we require that they confirm to us that:

1. That they are ensuring all staff are paid at least the national minimum wage (for UK based employees).
2. If they are international, they pay their employees the prevailing wage in the correct country of operations.
3. If found to be using modern slavery, their contract will be cancelled, and all connections will be terminated.
4. They have suitable and necessary policies and procedures in place to ensure their own supply chain is free from modern slavery.

## TRAINING

We regularly conduct training or seek what training is required for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## 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 customer complaints in terms of the use of modern slavery are received.
- No law enforcement has been in contact regarding modern slavery.

This statement was first approved on the 1<sup>st</sup> April 2019 and is reviewed and updated when required.

Signature:



Date:

21<sup>st</sup> December 2024

Name:

Rob Flinn

Position:

Chief Executive Officer