

Modern Slavery Policy

Our business is committed to combatting slavery and human trafficking in its business and supply chains, and we make this statement to assist with compliance with the Modern Slavery Act 2015.

As our business has a turnover of less than £36 million, we do not have a legal obligation to produce a modern slavery statement. However:

- a. We agree that exploitation within all supply chains ending in the UK is a blight on our society, and we are committed to playing our part in eliminating exploitation.
- b. We understand that customers with obligations under the Modern Slavery Act 2015 cannot comply with those duties without our cooperation.

This policy is published voluntarily and reflects SGC Holdings Ltd's commitment to ethical business practices and responsible supply chain management, notwithstanding that the Company is not currently subject to the statutory reporting threshold under section 54 of the Modern Slavery Act 2015.

Our Organisation

SGC Holdings Ltd T/A SGC Security Services is a UK based security company established in 2006.

Our services are delivered from our main Head Office site located in Sible Hedingham, we employ around 300 full/part time staff.

Our commitment to the principles of the Modern Slavery Act 2015:

As an equal opportunities' employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Any breach of these principles by employees, contractors, or business partners may result in disciplinary action, termination of contracts, and/or reporting to relevant authorities.

Our Supply Chain

To that end, we confirm that we have examined our own business and, to the extent that it is reasonably practicable, businesses within our supply chain and we confirm the following:

- a. We confirm that within our own business, no relevant offence relating to slavery or human trafficking has been committed.

- b. We have made enquiries of businesses that supply directly to us and we are confident that no relevant offence is committed in that business.
- c. Insofar as it was reasonably practicable, we have examined our supply chains and confirm that we found no evidence of slavery or human trafficking.

Where it is reasonably practicable, we ensure that businesses in our supply chain have made a similar statement relating to slavery and human trafficking.

We also encourage all employees to report on any matters relating to slavery or human trafficking in our supply chains of which they become aware.

Reports may be made in accordance with the Company Whistleblowing Policy and will be handled confidentially.

Modern Slavery Act - Section 54

Section 54 of the Modern Slavery Act details the following:

- (4) A slavery and human trafficking statement for a financial year is—
 - (a) a statement of the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place—
 - (i) in any of its supply chains, and
 - (ii) in any part of its own business, or
 - (b) a statement that the organisation has taken no such steps.
- (5) An organisation's slavery and human trafficking statement may include information about;
 - (a) the organisation's structure, its business and its supply chains;
 - (b) its policies in relation to slavery and human trafficking;
 - (c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
 - (d) 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;
 - (e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
 - (f) the training about slavery and human trafficking available to its staff.

Due Diligence Processes

Detail the due diligence undertaken by the organisation including when taking on new suppliers and when reviewing its existing suppliers.

- Mapping the supply chain to assess product or geographical risks.
- Evaluating the modern slavery and human trafficking risks of each new supplier.

- Reviewing on a regular basis all aspects of the supply chain.
- Taking steps to improve sub-standard suppliers' practices.
- Requesting certification and verification of third-party audits


Steps to Assess and Manage Risks

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

Training

Describe broadly the training that has taken place either directly within the organisation, or with suppliers and others, to better understand and respond to the identified slavery and human trafficking risks.

- How to assess the risk of slavery and human trafficking
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios.

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| Name | Paul Macarthur | Position | Managing Director |
| Signature |  | Date | 14/01/2026 |