



## POLICIES

# ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015

## OUR BUSINESS

**Cennox is a multi-skilled solutions business. We work across diverse industries, from banking to transport, retail to airports, supporting the world's leading brands to deliver their services & transform their business.**

Our key deliverables include the supply, installation and ongoing maintenance of technical multi-vendor self-service hardware. We provide a suite of intelligent & physical security solutions protecting assets and infrastructure. We are a turnkey organisation transforming businesses through end-to-end property refresh projects, supported with our full portfolio of bespoke sign making & branding services. Importantly and uniquely, we do all this in-house and nationwide.

Employing over 1,800 staff worldwide, Cennox have three main Headquarters to support their regions, these are located in:

UK - Cennox, Admiralty Way, Camberley, Surrey, UK

USA - 1015 Windward Ridge Parkway Alpharetta, GA 30005

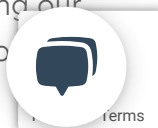
EU - Cennox, Leuvensesteenweg 540, bus 4, Zaventem, Brussels, Belgium


There are numerous offices within each region. All Group activities emanate from the UK office.

## OUR SUPPLY CHAIN

Our supply chains include providers of global OEM hardware & administrative, transport and warehouse suppliers and strategic sub-contractors supporting our delivery of services. Cennox works to communicate our Anti-Slavery & Human Trafficking po

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our supply chain each year. This includes our expectation on our supply chain to understand and agree to our ethical operating policies around this important global requirement. 

We have in place a supply chain compliance programme that is maintained by the relevant managers of HR, Legal & Compliance. This consists of client reviews; audit; and self-certification declarations.

## **OUR POLICY ON SLAVERY & HUMAN TRAFFICKING**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing 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.
4. Equal opportunities policy. We are committed to providing equal opportunities in employment and to avoiding unlawful discrimination in employment. Our range of controls include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.

## **COMMITMENTS**

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

Adopt a zero-tolerance approach to modern slavery in our organisation and our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based

based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk-based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code

As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.

If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

## **TRAINING & COMMUNICATION**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, in our supply chains and in our business partners, we provide relevant training to our staff.

In addition, our policy on Anti-Slavery & Human Trafficking is communicated to staff through their personal Employee Handbook, made available through our website and displayed at our offices in or close to the main areas of staff congregation. We welcome feedback and the support of our staff to share with us any and all circumstances of human trafficking they could be aware of.

## **OUR 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 reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

All employees and supply chains are aware of their obligations.

## **APPROVAL FOR THIS STATEMENT**

This statement was approved by the Cennox Board of Directors and signed on its behalf by:





8th July 2024



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