

MODERN SLAVERY ACT 2015

GENERAL

The Modern Slavery Act 2015 requires companies with a turnover greater than £36m to disclose annually online, as a minimum, the following:

- I. The organisation's structure, its business and its supply chains;
- II. Its policies in relation to slavery and human trafficking;
- III. Its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- IV. 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;
- V. 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.
- VI. The training available to its staff involved in supply chain management and employees throughout the rest of the organisation.

WINLOCK

Winlock Security Ltd is part of a Group with turnover less than the £36m threshold and is therefore not required to comply with the provisions of the Act. However, Winlock does have the following policy with regards to Modern Slavery and other abuses of human rights in the workplace:

1. Company Policy

Winlock will not enter into commercial arrangements with any organisation that is engaged in human trafficking, forced labour, prostitution or the use of child workers.

The Managing Director is responsible for compliance with this policy, and for assessing the risk of non-compliance attaching to the Company's supply chain.

In mitigation of these risks the Company has in place a supply chain vetting process which is set out below.

2. Supply Chain Vetting

2.1 UK Services

Where UK services are supplied to the Company suppliers are vetted to ensure they are legitimately registered UK companies and are legitimate trading enterprises.

Given the size of Winlock it is not practical to visit all UK services suppliers premises, however where the service requires the provision of labour to our premises (for example, the provision of temporary warehouse staff) the supplier will be interviewed prior to supply taking place.

Any suspicion that UK suppliers are involved in offences covered by the Act will be reported by the Company's Directors to the UK police.

2.2 UK Goods for Resale

In addition to vetting applicable under 2.1, suppliers of goods for resale with a value of more than £10k per annum would be visited by a Company Director or senior representative in order to ensure that the suppliers operations are, so far as can be verified, compliant with the requirements of the Act.

2.3 Imported Goods for Resale

The Company has several significant suppliers in Asia, particularly Taiwan and China, the latter region in particular involving an elevated risk of human rights abuses in the workplace.

In order to assess and verify this risk of abuse all suppliers or potential suppliers from outside the UK are visited by a Company Director prior to trade commencing. Any evidence of abuses of workers human rights would disqualify the supplier from trading with the Company. These abuses are not limited solely to those identified under the Act, and would extend, for example, to instances of gross negligence relating to health and safety at work.

Alan Parker

Winlock Security Ltd