Modern Slavery Statement 2023

This statement is published in accordance with the provisions of the Modern Slavery Act 2015 and sets out the steps that Croma Security Solutions Group Plc and its subsidiaries have taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain for the financial year ended 30th June 2023.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Company has 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.

The Company provides a complete life-safety and security protection service ranging from design and installation to service and maintenance, on a mainly commercial level to businesses across the South of England and Wales, and beyond.

OUR POLICIES

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

- **Recruitment and Training 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.
- 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.
- **Code of business conduct:** this code explains the manner in which we behave as an organisation and how we expect our employees and external providers to act.

OUR EXTERNAL PROVIDERS

The Company operates an external provider policy and maintains a preferred list for key providers. We conduct due diligence on all external providers before allowing them to become a preferred provider. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and on-site audits which include a review of working conditions, where deemed necessary. Our anti-slavery policy forms part of our contract with all external providers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with external providers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own external providers to account over modern slavery
- For UK based external providers; they pay their employees at least the national minimum wage/national living wage (as appropriate)
- For international external providers, they pay their employees any prevailing minimum wage applicable within their country of operations

We may terminate the contract at any time should any instances of modern slavery come to our attention.

TRAINING

We conduct training for our procurement 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.

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.

Signed by Roberto Fiorentino
Chief Executive Office

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