The Steadfast Security Group

Modern Slavery & Human Trafficking Policy

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GENERAL INFORMATION			
Organisation:	**Steadfast Security Group**		
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AMENDMENTS				
Ser No	**Section**	**Reason for Amendment**	**Amended By**	**Date**

REVIEWS				
Ser No	**Date**	**Reason for Review**	**Reviewed By**	**Next Review**

INTRODUCTION

1. This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending **31 March 2025.**

SCOPE

2. The Steadfast Security Group (**Steadfast**), comprising of Steadfast Security Solutions Limited (**Solutions**), Steadfast Security Systems Limited (**Systems**), Steadfast Secure Storage Limited (**Storage**) and Complete Security (Europe) Limited (**Complete**) is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

ORGANISATIONAL STRUCTURE

3. Steadfast has business operations throughout the United Kingdom.

4. We operate in the security industry sector. The nature of our supply chains is as follows: We work with several key direct suppliers, who provide us with goods, such as equipment for our premises, and services, such as security installation equipment, IT software and marketing services.

5. For more information about Steadfast, please visit our website: www.steadfastsecurity.co.uk

POLICIES

6. We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include the following:

   a. **Recruitment and selection policy** - We conduct checks on all prospective employees to verify that they are eligible to work in the UK. Certain roles require a Disclosure and Barring Service (DBS) check where employees may be working with vulnerable people.

   b. **Supplier code of conduct** - Steadfast is committed to better understand our supply chains and working towards greater transparency and responsibility towards people working in them. Our suppliers are required to comply with the Modern Slavery Act 2015.

   c. **Whistleblowing policy** - Seeks to prevent modern slavery by ensuring all individuals including staff, suppliers, partners, grantees, or contacts know how to securely express a concern they have regarding the conduct of Steadfast or that of our employees.

   d. **Staff code of conduct** - Ensures that Steadfast Employees receive regular training on modern slavery and ethical employment practices.

   e. **Procurement policy** - Is committed to ethical purchasing and ensuring our supply chain operates in an ethical and sustainable way.

   f. **Safeguarding policy** - Seeks to prevent modern day slavery by ensuring children are not neglected in any way and are protected and mechanisms are in place to report any form of abuse.

7. We make sure our suppliers are aware of our policies and adhere to the same standards.

DUE DILIGENCE

8. As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

a. Internal supplier audits.

9. Our due diligence procedures aim to:

a. Identify and action potential risks in our business and supply chains.

b. Monitor potential risks in our business and supply chains.

c. Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

d. Provide protection for whistleblowers.

RISK AND COMPLIANCE

10. Steadfast has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

a. Evaluating the slavery and human trafficking risks of each new supplier.

b. Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

11. We do not consider that we operate in a high-risk environment. The business operates in this risk level environment because most of our supply chain is based in the UK and in low-risk industries.

12. We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

EFFECTIVENESS

13. Steadfast uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

a. We will contact suppliers to enquire about their modern slavery practices every 12 months.

b. We will train our staff about modern slavery issues and increase awareness within Steadfast.

c. We will carry out a regular audit of suppliers - 50% of suppliers each year.

TRAINING STAFF

14. Steadfast requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The training covers:

a. How to identify the signs of slavery and human trafficking.

b. What initial steps should be taken if slavery or human trafficking is suspected.

c. How to escalate potential slavery or human trafficking issues to the relevant parties within Steadfast.

d. What external help is available.

FEEDBACK

Steadfast encourages all employees to share feedback on its policies to support continuous improvement. If you have any comments, questions, or concerns regarding this policy, please contact the Compliance Manager by emailing

steven.hope@steadfastsecurity.co.uk. Your input is valued and helps ensure our policies remain clear, effective, and inclusive.

APPROVAL

This policy has been formally approved by the Board of Directors of Steadfast Security Group and is authorised for distribution across the organisation. All employees are expected to familiarise themselves with its contents and adhere to the principles and procedures outlined herein.

Paul Harbord
Managing Director, The Steadfast Security Group
02 October 2025