



# **MODERN SLAVERY & HUMAN TRAFFICKING POLICY OF Mountain Security Services Ltd**

## **1. Introduction**

1.1) This statement sets out MSS - Mountain Security Services Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

1.2) As part of the security industry, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

1.3) MSS is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## **2. Company Structure and Supply Chains**

2.1) This statement covers the activities of MSS:

MSS is an independent security company specialising in security services of customer premises, events, personnel and assets.

2.2) The Company was founded in 2021, yet has a wealth of experience via its management. MSS, operating within the UK, develops partnerships with its clients, understanding their security needs and strategy; this enables MSS to provide an individual service to meet the client's needs and expectations.

2.3) MSS provides specialist services within the provision of security guarding, dog handling, mobile patrolling, client Key Holding and CCTV surveillance.

2.4) All right to work, residency, Security Industry Authority and employment history verification checks are conducted across the entire workforce in accordance with the Immigration, Asylum and Nationality Act 2006, BS7858 standards and SIA requirements.

2.5) There are no activities that are considered to be at high risk of slavery or human trafficking. Through the supplier/procurement code of conduct the Company will ensure that all suppliers will also adhere to the Modern Slavery Act 2015.

## **3. Responsibility**

3.1) Responsibility for the company's anti-slavery initiatives is as follows:

3.2 Policies: Director and Head of Human Resources

3.3 Investigations/Due Diligence: Human Resources Manager is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.

3.4 Training: Contracts Manager and Human Resources Manager are responsible for ensuring that the awareness of slavery and human trafficking risks are communicated throughout the company and through the supply chain.

#### **4. MSS's Modern Slavery & Human Trafficking Statement**

4.1 The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

4.2 Employee Concerns (Whistle-blowing) Policy: The Company encourages all its stakeholders to report any concerns related to the direct activities, or the supply chains of, the company. This can include any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

4.3 Employees, customers or others who have concerns can report any activities associated to slavery and human trafficking by contacting their immediate operations manager, or confidentially to the Human Resources Manager.

4.4 Employee Handbook: MSS's Employee handbook makes clear to employees the actions and behaviour expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

4.5 Supplier/Procurement Code of Conduct: The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. As part of the supply chain selection process all potential and existing suppliers are required to complete a Supplier Questionnaire to assess their suitability as a supplier. This enables the company to identify any potential risks to the quality of the service provision or goods being provided by the supplier and prevent any slavery or human trafficking.

4.6 Recruitment Policy: Prior to commencement of employment all employees are subject to right to work, residency, SIA and employment checks in accordance with the Immigration Asylum and Nationality Act 2006, Security Industry Authority and BS7858 Code of Conduct. The Recruitment Policy is compliant to all EU and UK legislation, including the minimum wage and therefore is not at risk of slavery and human trafficking.

4.7 Corporate Social Responsibility Policy: MSS's Corporate Social Responsibility policy covers the responsibilities of the Directors and the company's commitment towards the external Environment, Health & Safety and Workplace responsibilities. The Policy is communicated to the whole workforce and forms part of the induction programme.

#### **5. Due Diligence**

5.1 The company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The company's due diligence and reviews include:

5.2 MSS's Modern Slavery & Human Trafficking Statement evaluating the modern slavery and human trafficking risks of each new supplier in accordance with the supply chain selection process.

5.3 MSS will conduct supplier audits with a degree of focus on slavery and human trafficking.

5.4 Where general risks are identified, take steps to improve substandard suppliers' practices, including providing advice to suppliers and require them to implement action plans where applicable.

5.5 If required, invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our core principles relating to Modern Slavery; including the termination of the business relationship.

## **6. Performance Indicators**

6.1 In light of the introduction of the Modern Slavery Act 2015 the company will review its existing supply chains, as a minimum; on an annual basis to ensure their compliance to the Modern Slavery Act 2015.

## **7. Training**

7.1 The company will require all staff, including managers within the company to receive awareness training on modern slavery as a module within the company's induction, management development and refresher programmes.

7.2 The company's modern slavery awareness training will cover:

7.3 The company's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

7.4 How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;

- 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 to the relevant parties within the company;
- what external help is available, for example through the Modern Slavery Helpline, [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org)
- What steps the company should take if suppliers or contractors do not implement antislavery policies in high-risk scenarios, including their removal from the company's supply chain.
- MSS's Modern Slavery & Human Trafficking Statement

## **8. Review**

8.1 The company will review this policy as a minimum on an annual basis

Approved By

**Kazim Ali Shah (Director)**

Issue Date: 1st Nov 2024

Review Date: 1st Nov 2025