



Sword Security (N.I.) Ltd Modern Slavery Act 2015 Statement

ORGANISATION

This statement applies to Sword Security (N.I.) Limited. The information included in the statement refers to the financial year ending 31st May 2016.

ORGANISATIONAL STRUCTURE

The Company offers services in the form of Static Guarding, CCTV Monitoring, Retail Security, Mobile Patrols, Key Holding and Alarm Response, Vehicle Tracking/Immobilisation, Reception/Concierge, Fire/Intruder/Panic Alarm, CCTV Remote Monitoring, Customer Service, Training and Cleaning Facilities to clients around Northern Ireland. Sword Security (N.I.) Limited has approximately 380 employees in Northern Ireland.

The Company commits at all times to conducting business in a responsible way and to operate under the Sword Security (N.I.) Limited Code of Conduct.

The labour supplied by Sword Security (N.I.) Limited in pursuance of its operation is carried out in Northern Ireland.

DEFINITIONS

The organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

Sword Security (N.I.) Limited acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Sword Security (N.I.) Limited understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Sword Security (N.I.) Limited does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided by Sword Security (N.I.) Limited in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in Northern Ireland.

POTENTIAL EXPOSURE

In general, Sword Security (N.I.) Limited considers its exposure to slavery/human trafficking to be relatively limited, nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

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STEPS

Sword Security (N.I.) Limited carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Sword Security (N.I.) Limited has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Sword Security (N.I.) Limited has taken the following steps to ensure that modern slavery is not taking place:

- reviewed supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- put measures in place to identify and assess the potential risks in its supply chains;
- undertaken impact assessments of services upon potential instances of slavery;
- created action plans to address risk to modern slavery;
- created zero tolerance policy towards modern slavery;

KEY PERFORMANCE INDICATORS

Sword Security (N.I.) Limited has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in Sword Security (N.I.) Limited or its supply chains.

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified


POLICIES

Sword Security (N.I.) Limited has the following policies which further define its stance on modern slavery, a modern slavery policy; a corporate social responsibility policy; supplier code of conduct; recruitment policy.

SLAVERY COMPLIANCE OFFICER

Sword Security (N.I.) Limited has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to Sword Security (N.I.) Limited obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

SIGNATURE:  Managing Director

NAME: DAVID CAIN Print

DATE: 1 - June - 2016