

## **Slavery and Human Trafficking Statement**

### **Angel Guard Ltd – Group Statement**

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps the Company has taken during the financial year from 1<sup>st</sup> January 2021 to 31<sup>st</sup> December 2021 to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

#### **Introduction**

Angel Guard Limited. During 2021, the Company has continued to develop our processes and procedures to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

#### **Key Areas of Focus for 2021:**

- Embedding procurement strategy processes in supplier selection and contracting process
- Training employees directly involved in engaging suppliers on supplier sourcing, due diligence, and contract management framework
- Developing technology systems to improve visibility and management of the supply chain
- Segmenting our supply base according to risk and criticality and applying suitable on-boarding and contracting processes for each

#### **Our Commitment**

We are committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as contemplated by the Modern Slavery Act 2015.

#### **Our Supply Chains**

Our direct suppliers are predominantly UK or EU based and support our business in the provision of labour, plant, materials, equipment, and professional services.

We are committed to ensuring that all suppliers adhere to the Angel Guard Code of Conduct which ensures that operations are completed ethically and with integrity. To ensure the requirements of the Code of Conduct are consistently met and that conformance with the Code can be verified, we expect our suppliers to put in place appropriate management systems and business processes.

## **Our Policies on Slavery and Human Trafficking**

As reported in our previous statements, the Company's internal policies include our Anti-Slavery and Human Trafficking Policy where we confirm our zero-tolerance approach to modern slavery and which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We also have an Anti-Slavery and Human Trafficking Policy for Suppliers which, as well as setting out our requirements, also includes links to government guidance and factsheets.

## **Assessment of Modern Slavery Risk within our Supply Chain**

In the past year we have continued our focus on Modern Slavery, reviewing risk assessments to determine where the risk of modern slavery and human trafficking lies both within the Group and in its supply chains.

All employees in the Company have their place of work as one of the offices owned or leased by the Company with the exception of a small number (less than five) who work from home. Our HR team oversees the engagement and contracting process for these individuals and articulates the benefits available to employees via handbooks and the Group's intranet.

Suppliers have been assessed in terms of the nature of services they supply to the Group and the geographical risk. These assessments cover the entire scope of our business, encompassing media agencies, online SEM, IT consultancies (including programmers and coders), PR agencies, HR consultancies, building contractors, cleaning companies and other professional service providers. Geographically, most suppliers are based in the UK (or we contract with and make payment to the UK office) with the exception of some SEM and IT licence suppliers. We are aware from due diligence that some of our IT programming/coding suppliers, whilst having a UK office base with whom we have a contract, are part of global organisations and utilise the services of individuals based in countries with emerging economies. Our risk assessment has also highlighted the possibility that in-service industries, particularly construction and cleaning, there could be the potential for workers to be put at risk of forced labour. We have categorised our suppliers as Tier1, Tier 2 or Tier 3 Risk Suppliers.

## **Due Diligence Processes for Slavery and Human Trafficking**

We understand that our biggest exposure to Modern Slavery remains with organisations, whilst having a UK office base, who utilise the services of individuals based in countries with emerging economies.

Existing suppliers categorised as Tier 1 Risk Suppliers ("Tier 1") and material Tier 2 Risk Suppliers ("Tier 2") have been made aware of our zero tolerance of modern slavery and have been asked to attest their compliance with the Modern Slavery Act 2015. During 2021, we have been working on embedding a robust procurement framework to support supplier onboarding and contract renewals. This includes, as part of our onboarding process, new suppliers in Tier 1 and Tier 2 being required to complete due diligence questionnaires incorporating questions on modern slavery and their associated policies and procedures. The responses will then be reviewed by the procurement team and, if required, discussed with the Company Secretarial team. New suppliers are also made aware of our zero tolerance of modern slavery and are issued with contracts covering compliance with modern slavery.

## **Training**

Employees are required to complete refresher training covering our Code of Conduct and Human Trafficking Policy on an annual basis. Training is provided to new employees as part of their induction.

## **Assessment of effectiveness in preventing modern slavery**

In order to assess the effectiveness of the measures taken by Angel Guard Ltd we are, or will be reviewing:

- investigations undertaken into reports of modern slavery (including any concerns raised under our Whistleblowing Framework) and remedial actions taken in response; and
- staff training levels.

## **Further steps**

We will continue to undertake training of employees, particularly those directly involved in engaging suppliers, to ensure they understand and comply with the supplier contract management framework when engaging and managing suppliers.

This statement was approved by the Directors of Angel Guard Ltd Signed

A handwritten signature in black ink, appearing to read 'Jonathan Waggott', written over a horizontal line.

Jonathan Waggott  
Managing Director of Angel Guard Ltd

Date: 24<sup>th</sup> September 2021