

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

1. POLICY STATEMENT

The Anubis Group (FM) Ltd requires its suppliers, subcontractors and labour providers to comply with all applicable requirements of the Modern Slavery Act 2015 and to conduct their activities in a manner that prevents slavery, servitude, forced or compulsory labour and human trafficking within their own operations and supply chains. This approach is consistent with current Government guidance on supply-chain transparency and due diligence.

As part of our supplier approval and ongoing management arrangements, we:

- communicate our expectations regarding ethical employment practices and Modern Slavery compliance;
- undertake proportionate due diligence when appointing suppliers and subcontractors;
- expect suppliers to maintain appropriate right-to-work, recruitment, employment and wage controls;
- require suppliers to raise any actual or suspected instances of modern slavery or exploitation;
- reserve the right to investigate concerns and suspend or terminate relationships where serious non-compliance is identified; and
- encourage employees and supply-chain personnel to report concerns through appropriate management or whistleblowing channels.

STAFF TRAINING AND AWARENESS

Anubis Group (FM) Ltd provides appropriate modern slavery and human trafficking awareness training to employees whose roles may expose them to recruitment, labour supply, procurement, subcontracting, employee welfare or supply-chain risks. The purpose of the training is to ensure that relevant staff understand the requirements of the Modern Slavery Act 2015, recognise the indicators of slavery, forced labour, exploitation and human trafficking, and know how to respond if they have concerns.

Training and awareness arrangements include:

- induction-level awareness of the Company's zero-tolerance approach to modern slavery and exploitation;
- guidance for managers, recruiters and those responsible for onboarding workers on identifying warning signs associated with forced labour, coercion or exploitation;
- awareness of right-to-work, recruitment, wage and employment controls relevant to preventing worker exploitation;

BIG ENOUGH TO DELIVER, SMALL ENOUGH TO CARE!

Anubis Group (FM) Ltd

Registered Office: 11 Clyde Street, Carlisle, ML8 5BA Company Number: SC730869

Issue Date: 28th Day of August 2026 Review Date: 30th March 2027 Version: 3

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Head Office: Anubis Group (FM) Ltd, 5 Union Street, Carlisle, ML8 4AG

TEL: 0800 121 6576

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- guidance for employees responsible for appointing or managing labour providers, subcontractors and suppliers on the need for proportionate due diligence;
 - information on common warning signs, including workers appearing to be controlled by another person, withholding of identity documents, unexplained deductions from wages, restriction of movement, threats, coercion or indications that a worker is unable to leave their employment freely;
 - instruction on how to escalate concerns through management or the Company's whistleblowing procedures; and
 - refresher communication or additional training where there are changes in legislation, Company procedures or identified areas of increased risk.

Employees are advised that they are not expected to investigate suspected modern slavery themselves. Any concern should be reported promptly to a Line Manager, Director or through the Company's whistleblowing arrangements so that the matter can be assessed and, where appropriate, escalated to the relevant authorities.

Training is proportionate to the employee's role and level of exposure to risk. Those involved in recruitment, labour supply, procurement and subcontractor management receive a greater level of awareness than employees whose roles have limited exposure to these areas.

The Company also reinforces its expectations through policies, management briefings and communication with relevant suppliers and labour providers. Records of relevant training and awareness activity are retained where appropriate, and the effectiveness of the arrangements is reviewed as part of the Company's wider compliance and supply-chain management processes.

Our approach is proportionate to the size and nature of our business and the risks associated with the security and labour supply sectors. Particular attention is given to labour providers and subcontracted personnel, where effective supply-chain due diligence is especially important. Government procurement guidance similarly emphasises maintaining an appropriate level of supply-chain due diligence to identify and reduce modern slavery risks. This provides us with reasonable assurance that organisations working on our behalf understand their responsibilities and operate in accordance with the standards we expect.

These arrangements, together with appropriate staff training and awareness, provide Anubis Group (FM) Ltd with reasonable assurance that employees and organisations working on our behalf understand their responsibilities, can recognise potential indicators of modern slavery and operate in accordance with the standards we expect.

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Anubis Group

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Signed for and on behalf of: **ANUBIS GROUP (FM) LTD**

Signature: James Bullock

Name: James Bullock

Position: Managing Director

Date: 28TH Day of August 2026

EMPLOYEE ACKNOWLEDGEMENT

I confirm that I have been provided with access to the Anubis Group (FM) Ltd Anti-slavery and human Trafficking Policy and understand my responsibility to raise genuine concerns regarding suspected wrongdoing in accordance with the procedures contained within it.

Employee Name: _____

Signature: _____

Date: _____

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