

**UNIVERSAL DEFENCE AND SECURITY SOLUTIONS (UDSS)**

# **Modern Slavery & Human Rights**

Version 2 dated June 2024

## POLICY CONTROL

<b>Policy Title:</b>	Modern Slavery & Human Rights		
<b>Issue Date:</b>	June 2024	<b>Review Date:</b>	October 2025
<b>Version:</b>	2	<b>Issued By:</b>	Peter Hewitt
<b>Scope</b>	This MSHR Policy applies to all UDSS entities and to all persons working for UDSS or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.		

<b>Associated Documentation:</b>	Modern Slavery Web Statement
<b>Approved By:</b>	Peter Hewitt
<b>Date:</b>	June 2024

<b>Review and Consultation Process</b>	<ul style="list-style-type: none"> <li>Annually ahead of Review Date, or ahead of a major change in operating procedures or information architecture.</li> <li>UDSS Board to oversee process</li> </ul>
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Revisions		
Date:	Author:	Description:
October 2022	Julia Grainger	Initial Issue
May 2024	Chrissie Ross	Amended issue



## CONTENTS

Contents

<b>POLICY CONTROL</b> .....	ii
<b>CONTENTS</b> .....	iii
<b>1. INTRODUCTION</b> .....	1
<b>1.1 Objective</b> .....	1
<b>1.2 Owner</b> .....	1
<b>2. Revisions and updates</b> .....	1
<b>3. Global Standard</b> .....	1
<b>4. Policy statement</b> .....	2
<b>5. Combatting modern slavery</b> .....	2
<b>6. Compliance with the MSHR Policy</b> .....	3
<b>7. The process for raising concerns</b> .....	4
<b>8. Communication and awareness of this Policy</b> .....	4
<b>9. Breaches of this Policy</b> .....	5

## 1. INTRODUCTION

### 1.1 Objective

The purpose of this Modern Slavery & Human Rights Policy (“MSHR”) Policy is to

(a) set out UDSS’s responsibilities, and the responsibilities of those working for and on behalf of UDSS, in observing and upholding UDSS’s position on modern slavery and human trafficking and;

(b) provide information and guidance to those working for and on UDSS’s behalf (such as a third-party suppliers) on how to recognise and deal with modern slavery and human trafficking risks and issues. The MSHR Policy is to be read in line with UDSS’s Vendor Management Policy & Process.

### 1.2 Owner

The board of directors of UDSS Global Inc. has overall responsibility for ensuring this MSHR Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Legal & Compliance function has the primary and day-to-day responsibility for implementing the MSHR Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring that those reporting to them understand and comply with this MSHR Policy.

You are invited to comment on the MSHR Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Cathy Doherty on [cathy.doherty@UDSSlaw.com](mailto:cathy.doherty@UDSSlaw.com).

## 2. Revisions and updates

Revisions to the MSHR Policy may only be made by UDSS’s Legal & Compliance function. This MSHR Policy will be updated on an annual basis unless circumstances or changes to UDSS’s business dictate that the MSHR Policy needs to be updated earlier than on annual cycle.

## 3. Global Standard

The Global Standard in this MSHR Policy is UDSS’s global position on modern slavery and human-rights matters. For certain jurisdictions in which UDSS operates there may be additional or alternative legal requirements which must be adhered to and these are found in the Local Appendices of this MSHR Policy.

#### 4. Policy statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains, consistent with our disclosure obligations under the law. We expect the same high standards from all of our contractors, suppliers and other business partners as part of our engagement processes and we expect that our suppliers will hold their own suppliers to the same high standards.

#### 5. Combatting modern slavery

Due to the nature of our business and how we operate, we tend not to be involved in instructing suppliers where the risk of modern slavery and human trafficking would be high. This does not mean, however, that we are complacent due to our business model and do not take this matter seriously. This is because UDSS cares about people as much as it cares about legal compliance and it would not tolerate a situation where any form of modern slavery or human trafficking occurred in its supply chains.

We have implemented a program in how our suppliers are managed and when it concerns modern slavery and human trafficking, there are certain steps that have to be considered where appropriate. These steps are as follows:

- We require all of our suppliers to take a zero-tolerance approach to modern slavery and to place similar expectations on their respective suppliers.
- Where we have a significant supplier and/or have assessed that there is a potential high risk for modern slavery with a supplier, we do one or more of the following:
  - We request that the supplier provide us with a copy of their modern slavery statement and/or internal policy.
  - We share our Supplier Code of Conduct and request that the supplier review it and attest to adhering to our standards.
  - We include further contractual obligations whereby the supplier is required to:
    - (a) confirm that it complies with all laws and regulations including that concerning combating slavery and human trafficking;

- (b) warrant that its business, and to the best of its knowledge, its own supply chains do not use modern slavery or involve human trafficking;
- (c) agree to provide us upon request with written responses to a self-assessment questionnaire regarding compliance with laws and regulations including on modern slavery and human trafficking;
- (d) agree to permit us and/or a third-party acting for us to inspect their facilities, records and practices, to have access to their personnel and to audit their business for the purposes of ensuring that they comply with these obligations and that there is no use of modern slavery or involvement of human trafficking; and/or
- (e) impose equivalent obligations on their own suppliers as we have placed on them. We have internal escalation channels which can be used by employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents and contractors can raise concerns and report instances of potential non-compliance with our values and principles (including on modern slavery and human trafficking), in full confidence and without fear of retaliation.

## 6. Compliance with the MSHR Policy

The prevention, detection and reporting of modern slavery and human trafficking in any part of our business or supply chains is the responsibility of all those working for us or under our control.

You should raise concerns about any issue or suspicion of modern slavery and human trafficking in any parts of our business or supply chains at the earliest possible stage, to your manager.

Management has a particular responsibility to identify, monitor and mitigate against potential risks in both our client relationships and in our supply chains, and your input is vital in allowing management to fulfil this responsibility.

In addition, you should be aware that there may be particular requirements when entering into new contractual relationships with clients or suppliers, and you should ensure that you have liaised with your manager or the head of your department or business division and/or the Legal & Compliance function to ensure that these requirements have been met when applicable.

You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

## 7. The process for raising concerns

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under the MSHR Policy, even if they turn out to be mistaken. Your voice is important and can make a huge difference in ensuring that UDSS and its supply chains are continuously acting ethically and in compliance with the law. Retaliation in any form against any individual who reports a violation of this MSHR Policy or of the law, even if the report is mistaken, will not be permitted under any circumstances. Such acts should be reported immediately to the Legal & Compliance function and those involved, if found guilty of such retaliation, will be disciplined appropriately.

You must notify your manager or the head of your department or business division and/or the Legal & Compliance function as soon as possible if you believe or suspect that a conflict with this MSHR Policy or a breach of this MSHR Policy has occurred or may occur in the future.

If the violation or suspected violation involves any of those parties or you do not feel comfortable to communicate with them directly, you should make your report directly to the Legal & Compliance function or

the UDSS Code of Conduct, Ethics & Compliance Hotline at 877-205-2492 (U.S. and Canada), 0808-234- 7051 (U.K.) 800-962-881 (Hong Kong), 800-110-1964 (Singapore), 0-800-890011 then 855-603-7058

(Switzerland) or 0-800-225-5288 then 855-603-7058 (Germany). The Code of Conduct, Ethics & Compliance website is <https://UDSSlaw.alertline.com>. Reports made on the Ethics Hotline may be made on a confidential and anonymous basis. If you make an anonymous report, please provide as much detail as possible, including copies of documents you believe to be relevant to the matter.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitute any of the various forms of modern slavery, please raise it with your manager or the head of your department or business division and/or the Legal & Compliance function (or alternatively, directly contact the Legal & Compliance or the UDSS Code of Conduct, Ethics & Compliance Hotline via the details above).

We will promptly investigate all reports of alleged non-compliance with this MSHR Policy and other reported improprieties and determine an appropriate course of action.

## 8. Communication and awareness of this Policy

Training on this Policy and on the risk our business faces from modern slavery and human trafficking in its supply chains, forms part of the induction process for all individuals who work for us, and further training is provided as and when necessary. Our zero-tolerance approach to modern slavery is communicated to all clients, suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 9. Breaches of this Policy

Any employee who breaches this MSHR Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We will terminate our relationship with other individuals and organisations working on our behalf if they breach this, Policy.