MODERN SLAVERY STATEMENT

MAKSIM KLANIA
FLASH SECURITY LTD
129 PETERSHAM DRIVE, ORPINGTON, ENGLAND, BR5 2QF

Flash Security Ltd is a company that offers installation and maintenance services for Intruder, CCTV and Fire Protection equipment throughout the United Kingdom. This Modern Slavery Policy and Statement applies to Flash Security Ltd.

Organizational Structure:

Flash Security Ltd operates from its main office located in the Southeast of London. The company provides security services for customers throughout the UK.

Definition:

Flash Security Ltd defines modern slavery as including human trafficking, forced work through mental or physical threats, employer ownership or control through mental or physical abuse, dehumanization, treating people as commodities, and physical constraint or restriction on freedom of movement.

Commitment:

Flash Security Ltd acknowledges its responsibility to address modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The company understands the need for an ongoing review of its internal practices concerning labour force and supply chains to ensure compliance.

Flash Security Ltd does not conduct business with any organization, in the UK or abroad, that knowingly supports or involves itself in slavery, servitude, or forced or compulsory labour. The company does not obtain any labour for its services through slavery or human trafficking. Flash Security Ltd strictly adheres to the minimum employment legislation standards in the UK and often exceeds those minimums for its employees.

Supply Chain:

Flash Security Ltd sources products from UK distribution companies that have undergone a vetting process as part of the supplier onboarding process. Each supplier is required to have an anti-slavery and human trafficking policy in place and an understanding of how to help tackle this global problem.

The company takes reasonable and practical steps to ensure its suppliers comply with its standards and with relevant legislation and regulations. Any instances of non-compliance are assessed on a case-by-case basis, and remedial action is taken as appropriate. Flash Security Ltd only conducts business with those who comply with this policy or those taking verifiable steps towards compliance.

Potential Exposure:

Flash Security Ltd acknowledges that its potential involvement in slavery/human trafficking is minimal. Nevertheless, the company has implemented measures to prevent the occurrence of such practices within its own operations and those of any affiliated organizations providing goods or services.

Considerations:

Flash Security Ltd conducts due diligence processes to ensure that slavery and/or human trafficking do not take place in its organisation or supply chain, including regular reviews of supplier controls. To the company's knowledge, it has not conducted business with any organisation that has involved itself with modern slavery.

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

- 1. Implementation of efficient HR, recruitment, and employment policies and procedures that comply with UK law.
- 2. Thorough security screening of all employees and appropriate checks on recruitment agencies and suppliers.
- 3. Open and transparent grievance policy and procedure for all employees.
- 4. Implementation of measures, including an annual review of all vendors and their modern slavery statements.

Policies and Statements:

The information contained in this policy serves as Flash Security Ltd.'s anti-slavery and human trafficking statement. Other related policies may include, but are not limited to, Recruitment Policy, Safeguarding and Employee Vetting Policy, and Corporate Social Responsibility Policy.

Code of Ethics:

Flash Security's Code of Ethics is the cornerstone of our corporate culture. It outlines the values and commitments that inform ethical decision-making in all our business dealings. This Code applies to Flash Security Ltd. Its adoption is intended to foster:

- (i) The practice of honest and ethical behaviour, including the ethical handling of potential conflicts of interest arising from personal and professional relationships.
- (ii) Fair dealing.
- (iii) The protection and appropriate use of Company assets.
- (iv) Adherence to relevant governmental laws, rules, and regulations.
- (v) The reporting of any illegal or unethical conduct.

Every year, Flash Security Ltd employees are required to certify that they have read and will adhere to the Code. Compliance with the Code's requirements is expected of all Flash Security Ltd employees, and violations of the Code will result in appropriate corrective action.

Accurate Record-Keeping and Speaking Openly

We maintain accurate record-keeping practices that reflect the nature and substance of each transaction in compliance with applicable regulations. At Flash Security Ltd, we encourage our employees and contractors to speak openly and raise concerns regarding potential violations of the Code of Conduct and related policies. We take these concerns seriously and ensure prompt handling. Retaliation against individuals who speak openly about conduct they believe to be unethical, illegal, or contrary to our Code of Conduct and policies is strictly prohibited.

Consequences

Our policies align with our Values and Code of Conduct, reflecting our core principles. We treat breaches of our policies with utmost seriousness. The consequences for such breaches vary depending on the severity of the violation and may range from a warning to termination of employment.

Signed

Maksim Klania

Date: 07/05/2023

Position: Managing Director

Flash Security Ltd

Our Purpose

"We build your safe and secure future today"

ISSUED BY: Maksim Klania

ISSUED ON: 07/05/2023

VERSION: 1

DOCUMENT ID: MSS - 001

This policy has been approved by the Senior Leadership Team of Flash Security Ltd

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