# convergint

### Modern Slavery Policy Statement (Modern Slavery Act 2015)

Structure, business and supply chains.

This Modern Slavery Policy Statement applies to Convergint, its associated companies, all colleagues together with its approved supply chain partners. Convergint install and maintain access control, CCTV and intruder systems. For details of associated companies, colleagues and approved supply chain partners these are available upon request.

We are committed to developing and adopting a proactive approach to tackling hidden labour exploitation across all our global operations. This commitment applies to job applicants and workers by third party individuals. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

Steve Dorking, (Managing Director) has overall responsibility for the implementation and monitoring of this policy together with assistance from the Compliance Department.

#### Policies in relation to slavery and human trafficking

#### Convergint will:

- Accept that job finding fees will never be charged to job applicants. The Company will not use any
  individual or organisation to source and supply workers without confirming that workers are not being
  charged a work finding fee.
- Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third-party labour exploitation and signs to look for.
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation.
- · Provide information on tackling "Hidden Labour Exploitation" to our workforce
- Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
- Positively encourage and support employees to report such exploitation which may be occurring within their communities through our Whistleblowing Policy.
- Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above

#### Identification of risks together with steps taken to prevent and manage that risk

Convergint apply a 'principles and outcomes' approach in risk management practices. This is in line with our ISO certification requirements. Modern slavery and human trafficking can be very hard to detect, especially when efforts are being made to hide this type of criminal and unethical activity. Convergint proactively monitor emerging threats to adapt our controls environment and keep pace with new threats and trends.

Convergint are confident in our ability to recognise signs of modern slavery and human trafficking through our internal and site audits which would trigger further probity if identified.

### Due diligence processes in relation to slavery and human trafficking in business and supply chains

Convergint have continued to develop our education and awareness programme, aligning the messaging to the specific nature of our business and modern slavery and human trafficking in a modern context. Whilst the risk exposures are low due to the nature of our business and core services, we are committed to making sure our colleagues stay alert and know what to do should they identify any suspicious activity.

Our control objectives are mapped against risks and designed to classify the control type, outline the purpose of the control, why the control exists and how to perform the control to ensure signs of modern slavery and human trafficking are detected, prevented and reported.

## Effectiveness in ensuring that slavery and human trafficking is not taking place in business or supply chains, measured against appropriate KPIs.

Convergint have internal controls in place as part of our sub-contractor (LSP) onboarding. We have a modern slavery reporting process which reports into the SMT Meetings.

#### Training and capacity building about slavery and human trafficking

Convergint designate appropriate managers are assigned Modern Slavery training and to have responsibility for supporting company procedures relevant to this issue.

All policies are communicated to the workforce via online and onsite training supervised by the training and compliance departments.

Signed:

Date: \ /7/15.

Steve Dorking

Managing Director (UK)