

## Modern Slavery Act 2015 Policy

### **Policy Statement**

Trinity Fire & Security Systems (Trinity) embrace ethical business practices and policies that protect workers from being abused and exploited in their own organisation and global supply chains. This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Trinity has taken steps and is continuing to take steps to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Trinity has a zero tolerance approach to any form of modern slavery

### **Commitment**

Trinity, including its board of Directors are committed to acting ethically with integrity and transparency in all business dealings. Putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Basic human rights**

The PTSG group Ethical Sourcing Policy [ESP] is based on the internationally recognised Social Accountability 8000 (SA 8000) criteria. The ESP covers the following areas of accountability:

- Child labour: No workers under the age of 15.
- Forced labour: No forced labour, including prison or debt bondage labour; no
- lodging of deposits or identity papers by employers or outside recruiters.
- Freedom of Association and Right to Collective Bargaining: Respect the right to form and join trade unions and bargain collectively.
- Discipline: No corporal punishment, mental or physical coercion or verbal abuse.
- Compensation: Wages paid for a standard work week must meet the legal and industry standards and be sufficient to meet the basic need of workers and their families.

### **Our Suppliers**

Trinity maintains a preferred supplier list for suppliers of materials and subcontractors. This forms part of our ISO certified procedures. This includes due diligence on all suppliers before allowing them to become a preferred supplier. Due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and on site audits for Sub-Contractors which include a review of working conditions. Our Modern Slavery /anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

We require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. They pay their employees at least the national minimum wage / national living wage.

Trinity will terminate the contract at any time should any instances of modern slavery come to light.

### **Employees**

We will conduct training if required for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

**Senior Managers** - Have received in house training /instruction/guidance formally delivered by Health & Safety Director

**Field Based Staff** - As part of Company induction new employees will be briefed/trained on what to look for (Signs of Modern Slavery on sites they are working. On going briefing will be provided on going via Toolbox talks.

**Modern Slavery Act 2015 Policy****Continual Improvement**

Trinity are committed to continuous improvement in customer service. We encourage and welcome feedback as this will provide us with the opportunity to improve. If a customer is not satisfied with the level of service received, this will be dealt with through our complaints procedure. We will respond quickly, efficiently and effectively.

**Communication & Training**

Trinity ensures that this Policy is embedded and understood throughout the organisation through internal and external communication.

**Monitoring Compliance**

Trinity will monitor the effectiveness of the steps taken to ensure that slavery and/or human trafficking is not taking place within our business or supply chain. This will also include reports received from employees, the public, or law enforcement agencies. The Managing Director has lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis (At least Annually) with the QA Director and HR and the Directors of the Company who have overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations.

**Our Suppliers/Sub-contractors**

Suppliers will need to demonstrate:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- They pay their employees at least the national minimum wage / national living wage.

Trinity Health & Safety Director will assist where possible with arrangements to fulfil the requirements of our suppliers /sub-contractor – sharing information with interested third parties.

Trinity aligns itself with PTSG Group Policies Stronger together campaign, Sedex and sustainability school as promoted by our dominant clients taking on board any guidance or seminars provided.



Adam Davies  
**Managing Director**  
10<sup>th</sup> May 2025