SKYE GUARDING

YOUR SECURITY PARTNER

Skye Guarding Policies

Modern Slavery Act Policy

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MODERN SLAVERY POLICY STATEMENT

Skye Gaurding Limited (“the Company”) is committed to preventing all forms of modern slavery throughout its operations and its supply chain. This Policy applies to all employees (“Employees”). We expect similar practices to be followed by our suppliers and subcontractors (collectively referred to as “Suppliers”).

This policy will be reviewed on an annual basis or when procedural, legislation or best practice changes occur to ensure it remains effective, and any necessary amendments will be communicated to all employees. This is critical to the continuous success of our business as it allows us to optimise our company performance and adds value for all our stakeholders.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and represents Alert Logic’s slavery and human trafficking statement for the financial year ended December 31, 2023.

Shahid Chaudhry

Shahid Chaudhry
Managing Director

Date: 01/01/2026

1. INTRODUCTION

This Policy sets out the standards with which the Company and Employees are expected to comply with regard to modern slavery and compliance with the law. These standards take precedence over local or industry wide 'custom and practice'.

The Company, in compliance with the Modern Slavery Act 2015 ("the Act"), requires the Company's annual statement on modern slavery on the homepage of its website.

2. DEFINITIONS

Modern Slavery

The term 'modern slavery' is used to denote situations where one person deprives another person of their liberty in order to exploit them for personal or commercial gain.

Human Trafficking

Human trafficking is the act of recruiting, transporting, transferring, harbouring or receiving a person, through any coercive means (such as threat, use of force, deception or abuse) for the purpose of exploitation. Where the victim is under 18 years of age, there is no requirement of coercive means.

Forced Labour

Forced labour is any work or service which people are forced to do against their will under the threat of some form of punishment. Almost all slavery practices, including trafficking in people and bonded labour, contain some element of forced labour.

3. POLICY

Compliance With the Law
The Company and all Employees are required to comply fully and to behave in accordance with the Act.

The consequences of infringing the Act are extremely serious both for the Company and for individual employees and may include the imposition of significant financial penalties. Ignorance of the law is neither an acceptable excuse or defence to non-compliance, and the Act makes it clear that the consent of the victim is not an automatic defence.

All migrant workers will be treated in accordance with UK legislation and existing HR policies and practices and will be subject to the same employment contract terms as other potential recruits. The Company requires that the following practices are complied with:

Forced or involuntary labour

Employees shall not be subject to any form of forced, compulsory, bonded, indentured or prison labour. All work must be voluntary, and Employees shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length as required by their employment contract.

Recruitment fees

Employees shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries.

Document retention

Confiscating or withholding identity documents or other valuable items, including work permits and travel documentation (such as passports) is strictly prohibited. All documentation retention shall be in line with Data Protection and Document Retention guidelines.

Contracts of employment

All Employees will be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.

Deposits

No Employees will be required to lodge deposits or security payments at any time.

Humane treatment

The workplace shall be free of any form of harsh or inhumane treatment (such as harassment, mental or physical coercion, or verbal abuse of employees; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour) for all Employees and potential employees.

Workplace equality

All employees, irrespective of their nationality or legal status, shall be treated fairly and equally.

Wages and benefits

All Employees shall be paid at least the minimum wage required by applicable laws and shall be provided with all legally mandated benefits. Wage payments shall be made at regular intervals and directly to all Employees, in accordance with national law, and shall not be delayed, deferred, or withheld.

Only deductions, advances, and loans authorised by national law or as set out in general Company policies are permitted (such as season ticket loans) and, if made or provided, actions shall only be taken with the full consent and understanding of Employees. Clear and transparent information shall be provided to employees about hours worked, rates of pay, and the calculation of legal deductions.

Working hours

Employees shall not be forced to work in excess of the number of hours permitted in national law. Where the law is silent, normal working hours shall not exceed eight per day and forty-eight per week and should comply with flexible working time policies and or normal Company contractual hours and total working hours including overtime shall not exceed sixty.

All overtime shall be purely voluntary unless part of a legally recognised collective bargaining agreement. Payment for overtime will be in accordance with Company additional hours worked guidelines and policies.

Freedom of movement and personal freedom

Employees' freedom of movement shall not be unreasonably restricted. Mandatory residence in employer-operated facilities shall not be made a condition of employment.

Private employment agencies and labour recruiters

Employees should be hired directly whenever possible through the use of the Company's Career website. When the subcontracting of recruitment and hiring is necessary, the Company shall ensure that the labour agencies it engages operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places employees at risk of forced labour or trafficking for labour exploitation.

4. GRIEVANCE PROCEDURE

The Company has in place grievance procedures to ensure that any Employee, acting individually or with other Employees, can submit a grievance without suffering any prejudice or retaliation of any kind.

5. DISCIPLINARY PROCEDURES

Any breach of this policy by an Employee which is upheld upon investigation should be dealt with in conjunction with the relevant Company disciplinary policy.

6. REPORTING, REFERRAL AND QUESTIONS

Employees who have any concerns over matters relating to this policy should raise them with their line managers. Where they are unwilling or unable to do so, or where they are dissatisfied with the outcome of having done so, Employees should either approach the directors of the Company directly or make their concerns known utilising the Company's free, confidential external Raising Concerns line on 0208 514 6565. The Company promises a timely investigation and follow up to any concerns raised this way. If any staff member believes or suspects a breach of or conflict with this policy has occurred or may occur, they must notify their line manager. Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If there is any uncertainty about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, it should be raised with a line manager. The government's Modern Anti-Slavery and Human Trafficking Slavery Helpline can also be contacted on 0800 0121 700 for further information and guidance on modern slavery.

If a specific case of modern slavery is identified here in the UK, it should be reported to the police immediately on 101. If potential victims are in immediate danger the standard 999 emergency number should be used. In the UK, mechanisms are in place to assist victims of slavery and human trafficking. If staff identify a potential victim, they can be referred (with consent) to the National Referral Mechanism to be formally identified as a victim of modern slavery and offered Government-funded support.

Further information

UK Government Modern Slavery Webpage
www.gov.uk/government/collections/modern-slavery

Modern Slavery Act 2015
www.legislation.gov.uk/ukpga/2015/30/contents/enacted

The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015
www.legislation.gov.uk/ukdsi/2015/9780111138847

Transparency in Supply Chains Consultation Document and Government Response
www.gov.uk/government/consultations/modern-slavery-and-supply-chains

Anti-Slavery Commissioner
www.antislaverycommissioner.co.uk/

Alliance 8.7
www.alliance87.org/