



PHR015

Anti-Slavery, Modern Slavery and Human Trafficking Policy

Introduction

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. This policy aligns to the Modern Slavery Act 2025.

This policy aligns with **Section 54 Modern Slavery Act**, and this statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Blue 9 Security Ltd, referred to as Blue Nine; has taken, and is continuing to take, to ensure modern slavery and human trafficking are not taking place within our business or supply chains.

Modern Slavery & Ethical Labour Statement

(Voluntary – aligned to Section 54, Modern Slavery Act 2015)

1. Our Organisation and Structure

Blue 9 Security Ltd, trading as Blue Nine is a UK-based small and medium-sized enterprise (SME) operating within the private security sector. We provide security services including guarding and related support services to public and private sector clients. The company employs a small workforce and works with a limited number of trusted suppliers.

Blue Nine's annual turnover is below the £36 million statutory threshold set out in Section 54 of the Modern Slavery Act 2015. As such, the Company is not legally required to publish a Modern Slavery Statement. However, we recognise the importance of ethical labour practices and voluntarily apply the principles of the Act in terms of maintaining policies, implementing due diligence and training to prevent modern slavery and human trafficking within its operations and supply chain.

Our Organisation

Blue Nine is a UK-based security services provider delivering manned guarding, mobile response, CCTV monitoring, and specialist protective services. As part of the private security sector, we recognise our responsibility to prevent exploitation, protect vulnerable individuals, and uphold the highest ethical standards.

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Our Commitment

Blue Nine is committed to preventing modern slavery, forced labour and human trafficking in all areas of our business and supply chain. We operate a zero-tolerance approach to modern slavery and expect the same standards from any organisation or individual we engage with.

We are committed to:

- A zero-tolerance approach to modern slavery.
- Ethical procurement and fair employment practices.
- Ensuring all staff, subcontractors, and suppliers adhere to legal and ethical obligations.

Our approach is proportionate to the size, scale and risk profile of our operations, while remaining aligned to UK legislation, recognised best practice and public sector expectations.

Risk Assessment

We assess risks relating to:

- Recruitment of security staff.
- Subcontracted guarding providers.
- Uniform and equipment supply chains.
- Labour agencies and temporary staff providers.

Due Diligence and Risk Management

As a small SME operating primarily within the UK security sector, we consider the risk of modern slavery within our direct operations to be low. Nevertheless, we apply proportionate due diligence measures, including:

- Direct recruitment of staff wherever possible
- Verification of identity, right to work and employment status
- Use of reputable suppliers with UK-based operations
- Refusal to engage suppliers that cannot demonstrate lawful and ethical employment practices

Any concerns identified are investigated promptly and escalated to senior management.

To reduce risks, we:

- Conduct right-to-work checks on all employees.
- Verify identity and documentation during recruitment.
- Require supplier compliance with the Modern Slavery Act.
- Maintain an approved supplier list.
- Investigate any suspicious or unethical labour practices.

Policies and Controls

Our commitment is supported through internal policies and procedures, including:

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- Ethical recruitment and fair working practices
- Right to work and identity verification
- Compliance with UK employment law, including minimum wage and working time regulations
- Whistleblowing arrangements allowing concerns to be raised confidentially

These controls are embedded within our ISO-aligned management systems and reviewed regularly by senior management.

- Modern Slavery & Human Trafficking Policy
- Whistleblowing Policy
- Recruitment & Vetting Policy
- Anti-Bribery & Corruption Policy
- Supplier Code of Conduct

Training and Awareness

All staff are made aware of expected standards of conduct and how to raise concerns. Managers responsible for recruitment and supervision receive additional guidance to help identify indicators of exploitation or unethical labour practices.

We deliver training to all employees covering:

- Recognising signs of modern slavery
- Reporting procedures
- Ethical conduct and safeguarding principles

Reporting and Continuous Improvement

Blue Nine encourages all staff to report concerns without fear of retaliation. Any reports relating to suspected modern slavery or unethical labour practices are treated seriously and investigated.

We review our approach annually to ensure it remains proportionate, effective and aligned to evolving best practice. Should the Company's size or turnover increase to meet the statutory threshold, we will fully comply with the formal reporting requirements of Section 54 of the Modern Slavery Act 2015.

Concerns can be reported via:

- Line managers
- Senior management
- Confidential whistleblowing channels

All reports are investigated promptly.

Our Ongoing Actions

We continue to:

- Review supply chain risks annually.
- Enhance staff training.
- Strengthen supplier audits.
- Update relevant policies and procedures.

➤ **Approval**

This statement has been approved by the Director of Blue 9 Security Ltd and will be reviewed annually.

Explanation of the Section 54 Requirement

Section 54 of the Modern Slavery Act requires commercial organisations operating in the UK with a turnover of £36 million or more to publish an annual statement outlining the steps taken to prevent modern slavery in supply chains.

Although Blue Nine may fall below this threshold, publishing a voluntary statement demonstrates ethical leadership, strengthens client trust, and aligns with security sector best practice.

Key requirements of Section 54:

- The statement must be approved by the Board or Director.
- It must be signed and dated.
- It must be published on the company website.
- It must be updated every financial year.

Company Pledge

Blue Nine holds a zero-tolerance approach to modern slavery or any form of exploitation or cheap labour, and 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 throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers and affiliates will hold their own suppliers to the same high standards.

Application of the Policy

This policy applies to all persons working for us or on our 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.

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This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibility for the policy

Blue Nine has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company has primary and day-to-day responsibility for implementing this 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 those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Colleague and Client Involvement

We welcome your input at all levels, and you are invited to comment on this policy and suggest ways in which it might be improved.

Comments, suggestions, and queries are encouraged and should be addressed to the Managing Director.

Compliance with the policy

All employees and associates in all forms, must ensure that you read, understand, and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

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

You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or Company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

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

Printed and Signed Off By: Mr William MacGowan, 28th November 2025



Managing Director
Blue Nine