

Poseidon Security Special Services LTD Company number 11141966 8 Banks Place, Marketplace, Dartford, DA1 1EX



### Introduction

Poseidon Security Special Services Limited ("the Company") is committed to conducting its business with integrity and in compliance with all applicable laws and regulations. This includes ensuring that modern slavery, human trafficking, and illegal working are not present in any part of our business or supply chain. This policy has been developed to meet the requirements of the UK Modern Slavery Act.

## Scope

This policy applies to all employees, contractors, suppliers, and other business partners of Poseidon Security Special Services Limited. The policy extends to all activities undertaken in the UK and any operations abroad, ensuring full compliance with UK laws and directives.

# Statement of Commitment

Poseidon Security Special Services Limited:

- Prohibits all forms of modern slavery and human trafficking within our operations and supply chains.
- Ensures strict adherence to UK immigration laws and employment regulations.
- Is committed to acting ethically and transparently in all business dealings.

## **Key Definitions**

- **Modern Slavery:** The recruitment, movement, harbouring, or receiving of individuals by force, coercion, abuse of vulnerability, or deception for the purpose of exploitation.
- **Illegal Worker:** A person who does not have the legal right to work in the UK as defined under the Immigration, Asylum and Nationality Act 2006.

### **Policy Objectives**

- To prevent and eliminate modern slavery and illegal working practices within our organisation and supply chains.
- To ensure all employees are legally entitled to work in the UK and are employed under fair and legal terms.
- To raise awareness and provide training to staff on modern slavery and illegal working.
- To establish and maintain robust processes for reporting, investigating, and addressing potential breaches.

# Legal and Regulatory Framework

This policy is aligned with the following UK laws and regulations:

- Modern Slavery Act 2015
- Immigration, Asylum and Nationality Act 2006
- National Minimum Wage Act 1998
- Equality Act 2010
- Gangmasters (Licensing) Act 2004



#### Responsibilities

- **Director:** Omosola Omotayo is responsible for overall compliance with this policy and ensuring its effectiveness.
- **Management Team:** Responsible for implementing this policy within their respective areas of control, including the supply chain.
- **Employees:** Must adhere to the principles of this policy and report any concerns promptly.

#### Due Diligence Processes

Poseidon Security Special Services Limited will:

- Conduct thorough pre-employment checks to ensure all employees have the legal right to work in the UK.
- Vet and monitor suppliers and contractors to ensure their compliance with antislavery and immigration laws.
- Include modern slavery and illegal working clauses in all supplier contracts.

#### Training and Awareness

- Provide regular training for employees on identifying signs of modern slavery and illegal working.
- Raise awareness of reporting mechanisms and whistleblowing procedures.

### Monitoring and Review

This policy will be reviewed annually and updated as necessary to reflect changes in legislation or organisational practices. Audits will be conducted to ensure compliance with this policy and relevant laws.

#### Breaches of Policy

Any breaches of this policy will be taken seriously and may result in disciplinary action, termination of employment, or termination of contracts with suppliers or contractors found to be in violation. Where appropriate, breaches may also be reported to relevant authorities.

#### Policy Approval

This Modern Slavery and Illegal Worker Policy has been approved by the Board of Directors of Poseidon Security Special Services Limited.

**Director:** Omosola Omotayo **Date:** January 2025