Human Trafficking and Modern Slavery Policy

DISTRIBUTION

This human trafficking and modern slavery policy is communicated to all employees. A copy is available at the Head Office, held in the sites folder, and published on the internal company shared drive. All employees are encouraged to read it and communicate any queries to a Director.

REVISION HISTORY

Issue Number	Review Date	Changes	Signed
01	22/09/2023	Original version (draft)	
01	22/09/2023	Signed off	
01	20/09/2024	Review	
01	19/09/2025	Review	
02	20/05/2026	Address Updated	
02	18/09/2026	Review	

Introduction:

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, like slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

It is a real problem for innumerable people around the globe, including many in developed countries, who are being kept and exploited in various types of slavery. Every company is in danger of being involved in this crime through its operations and its supply chain.

Policy Statement:

ZAM FM LTD has a zero-tolerance approach to modern slavery, and committed in acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls, to ensure modern slavery is not taking place anywhere in its own business or any of our supply chains.

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ZAM FM LTD has taken concrete steps to tackle modern slavery, as outlined in its statement. This statement sets out the actions that ZAM FM LTD has taken to understand all potential modern slavery risks related to its business and to implement steps to prevent slavery and human trafficking during the financial year 2022.

The ZAM FM LTD is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with their disclosure obligations under the Modern Slavery Act 2015.

ZAM FM LTD expects the same high standards from all of its contractors, suppliers and other business partners, and as part of their contracting processes, in the coming year, ZAM FM LTD will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

This policy applies to all persons working for ZAM FM LTD or on its 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.

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

Our Business and Supply Chains:

When it comes to security services, here at ZAM FM LTD, we take great pride in offering only the best. With experienced Security Industry Authority (SIA) licensed security guards, fully trained in handling all security services needs, you can trust the professionals in ensuring that your event runs smoothly and securely. We are an established business with a start-up mentality. ZAM FM LTD has been in the industry since 2014 providing the high-end top niche security services to its clients and business partners. We have managed to achieve this by:

- Consistently providing great service delivery
- Building up our brand awareness and reputation
- Continuing to promote a 'partnership' approach
- Being recognised as the company of choice for flexible, agile and tailored security and service solutions
- Promoting an environment where people want to work as a part of a team
- Managers are committed, loyal and take personal responsibility
- Big enough to deliver, small enough to care

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We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure include due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

The United Kingdom

ZAM FM LTD has not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Risk Assessment:

In the past year, ZAM FM LTD conducted a risk assessment of its supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- News analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

Policies:

ZAM FM LTD operates the following policies for identifying and preventing slavery and human trafficking in our operations:

Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.

Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Purchasing Code - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

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Supplier Due Diligence:
ZAM FM LTD conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

ZAM FM LTD requires all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

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.

Training:
In addition to the awareness programme, ZAM FM LTD has rolled out a fresh course to all employees and supplier contacts, which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices

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- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers concerning slavery policies and controls
- What steps ZAM FM LTD will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by ZAM FM LTD's anti-slavery policy

Measuring How We're Performing:
ZAM FM LTD has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?
- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?
- What are the findings of our cross-functional Human Rights team, which reviews how we are addressing modern slavery and human trafficking?

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.

Managing Director

Name: Danish Iftikhar

Sign: 

Dated: 22/09/2023