



Anti-Slavery and Human Trafficking Policy Statement

Overview

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, security agents, contractors and suppliers. ICTS (UK) Limited strictly prohibits the use of modern slavery and human trafficking in our operations and supply chains. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards. We will not knowingly work with companies that employ or utilise forced labour. We are committed to providing a work environment that is free from human trafficking and slavery by promoting ethical employment practices.

Organisation Structure

Established in 1987, ICTS (UK) Limited forms one of the largest subsidiaries of ICTS Europe SA. The ICTS service offering is based around three main operational elements:

Personnel: provision and management of security and customer service personnel, rigorously trained (and licensed for) a wide variety of disciplines.

Systems: provision of procedural, physical, and electronic security systems (including bespoke hard/software technologies) which can be used in isolation or integrated to provide a comprehensive security solution.

Canine: specialised canine sniffer dog search services providing passive and pro-active detection of drugs, explosives, firearms and currency.

We tailor our services to meet the needs of diverse industry sectors including (but not limited to) transport, nuclear, financial, tourist attractions, academic, healthcare, corporate and luxury retail.

ICTS (UK) Limited has approximately 3,000 employees operating in more than 100 locations.



Our Commitment to Anti-Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to act ethically and with integrity in all our business relationships, and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Modern slavery is a crime and a violation of fundamental human rights. ICTS (UK) Limited is a company that expects everyone working with us, or on our behalf, to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chains.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- As part of our ongoing risk assessments and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with the Anti-Slavery and Human trafficking laws.
- If we find that other individuals or organisations working on our behalf have breached the law, we will ensure that we take appropriate action.

We have a Compliance Team, which consists of the Company Secretary as the Senior Anti-Trafficking and Slavery Compliance Officer for the Company, allied with the Company's Human Resources Manager.

Due diligence processes for Anti-Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we:

- Build long-standing relationships with local suppliers and make clear our expectations of business behavior.
- Have a policy of *knowing our customer* to ensure that we are contracting with appropriate businesses.
- With regards to supply chains, we expect these entities to have robust anti-slavery and human trafficking policies and processes in place.
- Have in place processes and systems to encourage the reporting of concerns and the protection of whistle blowers.

Supplier Adherence

We have zero-tolerance to slavery and human trafficking. To ensure all those in our supply chains comply with our values, we have in place a Supply Chain Compliance Programme. This consists of suppliers, upon request, submitting certified agreement in compliance with this policy in each of the relevant countries in which they operate, and being able to demonstrate compliance to the reasonable satisfaction of ICTS (UK) Limited if audited.

Suppliers who are found to be engaging in human trafficking and slavery or who refuse to cooperate with our Supply Chain Compliance Programme will be liable to have any supplier agreement, arrangement or other contract with ICTS (UK) Limited terminated immediately without compensation and the violation being reported to the appropriate body for review.

We operate in full compliance with our Service Values and Code of Conduct. It is a requirement for any supplier working with ICTS to comply with our Supplier Code of Conduct Policy and agree to be audited as is practicable against its content. Our suppliers are required to (and must ensure that) their supply chain shall:

- Respect the rights of employees to freely associate and bargain collectively.
- Not use any forced labour or involuntary prison labour and allow all employees the choice to leave their employment freely upon reasonable notice.
- Not force the relocation or movement of any workers.
- Not use or promote forced or child labour in any way.
- Understand that all staff are entitled to work in an environment that respects their personal dignity and take steps to ensure that the working environment is free from harassment, bullying or any other type of intimidation.



Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, the Company will provide all employees and businesses with access to our Anti-Slavery and Human Trafficking Policy Statement, which is located on the Company's website and intranet site. We will provide any additional training and support on the subject where we feel this is required. We also provide briefings to our Directors and employees to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

Key Performance Indicators

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of audits by our Business Assurance department.
- Use of staff monitoring and payroll systems.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ICTS (UK) Limited's Anti-Slavery and Human Trafficking Policy Statement for the financial year ending 31st March 2022.

A handwritten signature in black ink, appearing to read 'Andy Kynoch', is positioned above the printed name.

Andy Kynoch

Managing Director

ICTS (UK) Limited

12 January 2021