

Slavery and Human Trafficking Statement

This statement is made in accordance with:

Section 54 of the Modern Slavery Act 2015 requires certain organisations to develop a slavery and human trafficking statement each year. The slavery and human trafficking statement should set out what steps organisations have taken to ensure modern slavery is not taking place in their business or supply chains.

<https://www.legislation.gov.uk/ukpga/2015/30/section/54>

GSC Approach and Commitments

Al-Ghadeer Security Company (GSC) is a 100% Iraqi-owned company, it's ethics and standards are measured against international codes and worldwide standards. GSC maintains a continuing commitment to respect human rights. We seek to use our Countrywide Iraq influence to help expand industry standards, deliver suitable employment opportunities and promote steadfast communities worldwide.

Everyone at GSC, including executives or employees at the frontline, is expected to respect and protect the human rights of the employees, the people in our care, those who supply GSC, and those who live and work in the communities in which we operate.

We understand that any human rights abuse is completely unacceptable and will not be tolerated under any circumstances.

We recognise that identifying modern slavery and human trafficking risks or practices can be challenging, we also understand that no entity should be complacent nor have the complete certainty that it is not present within its organisation or supply chain. Control measures with continual support checks is vital to minimise the risks.

We have made positive progress to our systems and controls, remaining dedicated to continual improvement to mitigate the risk of modern slavery and other human rights violations occurring in any of our operations and/or supply chains.

At GSC, we utilise a range of information sources to help us identify potential areas of modern slavery risk. These include the International Labour Organisation (ILO), and the United Nations Global Compact's Modern Slavery Working Group. As a result, we continue to focus on mitigating these risks within Iraq / Middle East.

Organisation

GSC has a countrywide footprint, with multiple projects/contracts across Iraq and is trusted to manage complex security matters for customers across a broad range of governmental and commercial industry sectors, including an International Airport.

We believe that there is no greater purpose than serving and helping safeguard customers, populaces, and people around the country.

- Bringing industry-leading security solutions to our consumers
- Creating rewarding work for our staff, subcontractors and third parties.

- Making a positive community and commercial contribution to our society
- Structuring GSC to create significant and sustainable value for our participants

Dealing with modern slavery risks in the supply chain

Although our subcontracting requirement is minimal, **we strictly prohibit the use of modern slavery in GSC's supply chain and are committed, together with our suppliers, to operate in an ethical way, respecting international human rights standards, including the prohibition of forced or coerced labour.**

Our risk assessment process has identified a small number of key categories of procurement as having a potential higher risk of exposure to modern slavery.

- a) Manufacture of electronic equipment and of textiles, Such as
 - I. Radios, tracking and IVMS equipment – external sources
 - II. Uniforms. Which are made outside of the country
- b) Non-technical facilities management, such as
 - i. cleaning, catering and support services.
- c) Temporary labour, short term

Although GSC is completely self-sufficient as a business, on rare occasions we ensure our provider/sub-contract abide and fully understand GSC's Code of Conduct clearly defining our requirements and expectations concerning key areas of answerable procurement, including the deterrence of modern slavery and human rights violations.

As a minimum, all Providers/sub-contracts are expected to comply with principles set out in GSC's Code of Conduct within their own organisation, to include further extensions to their supply chain and sub-contractors.

See website documents and Policies

20230819-GSC45.010a-VPSHR Policy-v2

- Working with subcontractors

20230621 - GSC45.004 - Code of Ethics Policy

- Business relationships

20230621 - GSC45.005 - Anti-Bribery Policy

- 2.8 Business relationships
 - Agents, representatives and sub-contractors

GSC Other key policies which relate to the prevention of modern slavery are

Our Code of Ethics policy, sets out in detail our expectations of how the company's values and standards should be applied in order to always do business in the right way. Supported by mandatory training programmes for all employees, the Code is inclusive and accessible to all and relevant at every stage of the employee lifecycle.

Our Codes, and its accompanying training package, include specific references to human rights matters.

Our Countrywide Human Rights Policy, and its supporting framework apply to all of GSC Countrywide, and defines our commitment to the Universal Declaration of Human Rights, the UN Guiding Principles on Business & Human Rights and the International Labour Organisation (ILO)'s Declaration on the Fundamental Rights at Work. – **See Declaration on Fundamental Principles and Right at Work on our website, alternatively see links below.**

Reference <https://www.ilo.org/> / <https://www.ilo.org/ilo-declaration-fundamental-principles-and-rights-work>

Our Whistleblowing Policy explains that every employee, subcontractor, or third-party has a responsibility to ensure that we uphold our core values, adhere to the law and deliver against the important commitments we set ourselves, including those in our Ethics Code, Human Rights Policy, Supplier Code of Conduct and Human Resources Core Standards.

Concerns can be raised anonymously through our website or hotline (where permitted by law) including those related to human rights. Access and availability is available, at any time of the day or night, by any employee, subcontractor, or third-party such as people we work with. Speak Out is promoted to employees and third parties at onboarding, as well as through employee handbooks, Ethics Code, posters, newsletters and other channels. Retaliation is strictly prohibited and any retaliation against those who Speak Out will be treated as a serious disciplinary offence. All concerns will be taken seriously.

See website documents

20230818 - GSC45.010 - Whistleblowing Policy and Process-v2



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