



Modern Slavery Policy

November 2022

Introduction

Pilgrims Risk Management Group is a security, risk management and service support company that identifies and manages risks. Our expertise allows your business to operate and develop, unhindered and unrestricted.

This statement sets out Pilgrims RMG actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. As part of Security and Risk Management, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery & human trafficking.

Modern Slavery Policy

It is our approach to comply with all laws and regulations relevant to our business in all countries where we operate. Following the implementation of the Modern Slavery Act 2015, Pilgrims is committed to maintaining and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our own business or in any of our supply chains. Modern slavery is criminal activity and a violation of human rights.

The deprivation of a person's liberty by another in order to exploit them for personal or commercial gain is unacceptable. For these reasons, slavery and human trafficking is a matter of zero tolerance at Pilgrims RMG.

All staff involved in the engagement of suppliers must communicate our zero-tolerance approach to all prospective parties at the outset of our business relationship and monitor our approach as appropriate thereafter. We may terminate our relationship with third parties engaged with us if they do not comply with this Policy.

This Policy applies to all members, employees, agents, consultants and those parties in our supply chain, wherever in the world they operate. Any reported breach of this Policy will be investigated and may lead to disciplinary action which subsequently could result in employee dismissal.

Modern Slavery Statistics





Responsibility for reporting incidents of slavery

The detection and reporting of slavery is the responsibility of all of us. You should raise any concerns about any issue or suspicion of modern slavery in any part of our business or supply chain at the earliest possible stage. Suitable channels of communication by which you can report confidentially any suspicion of slavery are detailed in Pilgrims Whistleblowing Procedure.

Organisational structure and supply chains

This statement covers the activities of Pilgrims RMG: Pilgrims RMG is one of the leading specialist security companies in the European Union and the world's largest provider of security services to the international media.

We will ensure the safety of our clients and customers by managing their risks in global environments through the use of high quality integrated services and expert personnel. With driving philosophies of engagement, integrity and consistency, we operate with efficiency and diligence, delivering flexible and effective award winning technical solutions that engender trusted partnerships and provide the highest value for money.

Countries of operation and supply

This policy applies globally. Annex A is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

High-risk activities

Annex A defines the activities which are considered to be at high risk of slavery or human trafficking:

Responsibility

Responsibility for the organisation's anti-slavery initiatives is shown in Annex B: Human Rights Risk Register. Whistleblowing policy and Grievance policy and procedure can be found at:

<https://pilgrims-rmg.com/contact/>



Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews are detailed in F535 Due Diligence Full Questionnaire, Partners and Subcontractors

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. Refer to Appendix A & B.

Training

The organisation requires all staff within the organisation to complete training on modern slavery.

This statement has been approved by the organisation's Group Chief Operations Officer who will review and update it annually.

Dave Freear: Signature:

A handwritten signature in black ink, appearing to read 'Dave Freear', with a stylized flourish at the end.

Date: 30 November 2022

Annex A

Human Rights Articles / Definition	Business risks & impacts/ Business opportunities: examples	IFC Policy on: Environmental & Social Sustainability: Relevant Performance Standards & paragraph numbers
<p>Right not to be subjected to slavery, servitude or forced labour</p> <p>UDHR 4; ICCPR 8; ILO No. 29; RO No.105</p> <p>Slavery occurs when one human being effectively owns another.</p> <p>The right to freedom from servitude covers other forms of dominance, egregious economic exploitation, and degradation of human beings, which might arise for example in the context of the trafficking of workers (including sex workers), serfdom and debt bondage.</p> <p>Given the extreme nature of these human rights abuses, the rights to freedom from slavery and servitude are subject to no restrictions or qualifications.</p> <p>Forced or compulsory labour is also prohibited, and is defined by the International Labour Organization (ILO) as:</p> <p>‘all work or service which is exacted from any person under menace of any penalty and for which the said person has not offered themselves voluntarily.’</p>	<p>Business risks and impacts:</p> <p>If companies directly make use of slaves, forced, bonded or involuntary prison labour.</p> <p>If companies benefit from the use of such labour by supplier, subcontractors and other business partners.</p> <p>Companies in the airline, shipping and other transportation industries, as well as those in the tourism sector may come into contact with trafficked persons if individuals are moved from one place to another for the purposes of forced or bonded labour such as forced prostitution or domestic servitude.</p> <p>Business opportunities</p> <p>When companies engage in collective action initiatives that help raise awareness about forced labour and human trafficking, they are promoting this right.</p> <p>Source: Human Rights Translated 2008; page 17.</p>	<p>PS1: Assessment and Management of Environmental and Social Risks and Impacts</p> <p>10. Requirements/ Environmental and Social Assessment and Management System / Identification of Risks and Impacts</p> <p>PS2: Labour and Working Conditions</p> <p>1. Introduction</p> <p>Objectives</p> <p>10 -11. Requirements/ Working Conditions and Management of Worker-Relationship / Working Conditions and Terms of Employment</p> <p>15. Requirements/ Working Conditions and Management of Worker Relationship / Non -Discrimination and Equal Opportunity</p> <p>21. Requirements/ Protecting the Work Force / Child Labour</p> <p>22. Requirements/ Protecting the Work Force Forced Labour including footnote 13)</p> <p>27. Requirements/ Supply Chain</p>