



SL SLAVERY AND HUMAN TRAFFICKING STATEMENT

Prepared by Secure Line

Iraq Office

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This statement is made in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps that we have taken to identify and reduce the risk of modern slavery occurring within our supply chain and business operations.

Trafficking Victims Protection Act {TVPA} 2000

- Labour trafficking: involves the recruitment, harbouring, transportation, provision, or obtaining of a person for labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery
- Sex trafficking: involves the recruitment, harbouring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act

Commitment and approach

Secure Line is committed to the respect of human rights and the continued development of an ethical and sustainable business model. We encourage the improvement of industry standards, the provision of decent employment opportunities and create secure and stable communities in Iraq.

Everyone at Secure Line, whether a director or frontline supervisor has a responsibility to respect and protect the human rights of the company's employees, the people in our care, those that supply Secure Line, and those that live and work in the communities in which we operate.

Any human rights abuse is completely unacceptable and will not be tolerated under any circumstances. We are fully committed to improving our systems and controls to help ensure that modern slavery and other human rights violations do not occur in any of Secure Line business operations.

We recognize the challenge in identifying modern slavery and human trafficking risks or practices, and understand that no organization can be complacent nor have complete certainty that it is not present within its organization. We have made good progress, but will continue to look for ways to enhance the protection of workers in our organization.

At Secure Line, we utilize a range of information sources to help us identify potential modern slavery risk areas. These include engagement with NGO's and other independent experts such as the UN Global Compact's Modern Slavery Working Group and the Norwegian Council on Ethics. As a result, we continue to focus our efforts on mitigating these risks in the employment of migrant workers in the Middle East and Asia.

Organization

With our headquarters in Iraq Basra, Secure Line is one of the leading, integrated security company in Iraq. We specialise in the provision of security and related services to a diverse range of customers across Iraq.

Our supply chain and Supplier Code of Conduct

We strictly prohibit the use of modern slavery in Secure Line supply chain and accept the shared responsibility with our suppliers to operate in an ethical way and to respect international human rights standards, including the prohibition of forced or coerced labor.

There are currently 20 suppliers supporting Secure Line Iraq operations with a broad range of goods and services, including uniforms, technology, catering, professional services and equipment. Our Supplier Code of

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Conduct sets out Secure Line requirements and expectations with respect to key areas of responsible procurement, including the prevention of modern slavery and human rights violations.

All suppliers to Secure Line are expected to comply with the principles set out in the Supplier Code or to commit to a clear timeline for full implementation within their own organization, as well as their associated suppliers and subcontractors.

To help ensure that these principles are met, we have increased our engagement with suppliers, particularly those categorized as potentially high-risk with regards to modern slavery.

Where their performance does not meet the required levels, a corrective action plan must be submitted to address the shortcoming.

To deliver the programmed, Secure Line procurement teams receive briefings on modern slavery to help build an understanding of the issues and awareness of the risk within the supply chain. Alongside these briefings, wider communications have been issued by senior management to employees about modern slavery in the supply chain and Secure Line commitments.

The programme has been implemented across our Iraq businesses.

We reserve the right to audit any of our suppliers and their subcontractors as part of any new contract of supply to confirm that the requirements set out in the Supplier Code are in force. Failure to allow an audit may result in the termination of any supply contract. If an audit identifies levels of non-compliance with the Supplier Code, the supplier will be required to provide a detailed remedial action plan in order to continue doing business with Secure Line.

Our business operations and our other policies

Migrant worker welfare and employment practices

We ensure that our employment policies and practices are consistent with international conventions, including the UN Guiding Principles on Business and Human Rights and the ILO core labor conventions.

For Secure Line, the employment of migrant labor is necessary in a small number in Iraq, where we employ around 10 migrant workers as the availability of local labor is scarce. We know that migrant workers are far from home and potentially vulnerable, and it is critical that we safeguard their welfare and human rights.

Our Migrant Workers Policy framework is based upon good practice principles and applies additional measures covering the use of recruitment agencies, accommodation standards and clear employment terms and conditions to help protect employees who are working away from their home country and the legal protections that this would provide them.

Secure Line is committed to ensuring the human rights of migrant workers (in the same manner as all its employees) are respected. Employment must be freely chosen with no use of forced, compulsory, bonded, indentured or child labour. We aim to offer decent work under terms which protect the health and safety of employees and ensure they are treated fairly, and with dignity.

Required to self-assess against our employment standards and human rights controls on an annual basis and report on action to address any gaps. These are monitored by the Group Human Resources Department and Director of Public Relations.

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The feedback from the self-assessment is consolidated to show year on year. Since the beginning of 2017, we have taken additional steps to enhance our protection of migrant workers in IRAQ.

We have continued to improve our Migrant Worker Policy framework to help ensure that all migrant workers have freedom of movement without restriction and retain all their identity documentation, that employees fully understand the terms and conditions of the roles they are applying for and that these are not varied adversely.

In July 2019, a Migrant Worker Coordinator was appointed to conduct a programmed of checks in both candidate's home and destination countries to verify compliance with our Migrant Worker Policy and to confirm that employee's experience during the recruitment process was consistent with our standards.

Where the Coordinator has established that these standards have not been met, appropriate remediation measures are made.

The programmed checks cover a range of areas, including:

- The use of recruitment agencies and associated costs being borne by employees in the recruitment process.
- Consistency of conditions set out in initial offers with actual terms on arrival in the destination country.
- Freedom of movement and any issues that may restrict this such as the withholding of passports or application of unreasonable notice periods or bonded costs.

Secure Line has committed to the principle of 'Employer Pays' as set out in the Principles of the Leadership Group for Responsible Recruitment.

Implementation of this principle begins in 2020, with the aim that all countries will be compliant by 2026. New health and safety officers and welfare officers have been appointed to support the wellbeing of our migrant worker employees.

In December 2020, Secure Line (CEO) hosted a briefing with all Secure Line managers to highlight the potential risk of modern slavery among our migrant worker population and to reiterate the company's commitment to ensuring that the welfare and human rights of all employees be protected and his expectation that all Secure Line leaders to achieve this.

Early in 2020, we delivered modern slavery briefing sessions for the leadership in all Secure Line businesses employing migrant workers.

While the focus for this programmed was on our responsibilities to migrant workers, it also highlighted other potential modern slavery situations and how they may relate to Secure Line within our organization, our supply chain and in our day to day operations.

Looking forward, the training programmed will be adapted and made available to wider audiences across the company.

We will also establish a Modern Slavery Steering Group, comprising a cross-functional team of subject matter experts from Secure Line, who will be charged with advising members of the Executive Committee on best practices to continue to combat all forms of modern slavery.

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Our Business Ethics Policy, which defines what we consider to be acceptable and unacceptable business practices.

The policy is reviewed and updated regularly and all senior managers are required to confirm their understanding of it and agreement to apply it within their areas of responsibility.

To ensure that our approach to business ethics reflects best practice and is suitable for driving the appropriate behaviours in a global workforce in 2020, we will be undertaking a thorough review of our policy and guidelines in this area and will relaunch a refreshed policy and framework this year.

Our Human Rights Policy, which applies to all of the Group's businesses, defines our commitment to the Universal Declaration of Human Rights, the UN Guiding Principles on Business & Human Rights and the ILO's Declaration on the Fundamental Rights at Work.

We regularly review the global human rights environment these may include restrictions on civil liberties, high levels of corruption and the local attitude to labour rights and standards.

The reviews findings are integrated into our risk and compliance processes and may trigger additional levels of assessment and internal audit where necessary.

Our Whistleblowing Policy, which explains that every Secure Line employee has a responsibility to ensure that we uphold our core values, adhere to the law and deliver against the important commitments set out in our Business Ethics Policy, Human Rights Policy, Supplier Code of Conduct and Human Resources Core Standards.

We encourage our employees to speak out and report any issues without fear of retaliation at grievance@securelinecomp.com

All those raising concerns in good faith will be taken seriously and treated with respect. Secure Line Ethics Steering Committee oversees the delivery of our whistleblowing policy and conducts reviews of serious cases, investigation progress and resulting actions.

One of the ways that we measure the confidence of employees to raise concerns is our regular Employee Survey. In 2020, 98% of our employees who responded to the survey indicated that they felt able to raise ethical concerns at Secure Line via the available email.

Despite the positive progress made in the area of whistleblowing, we are keen to ensure that our Whistleblowing Policy service reflects best practice and is capable of meeting the needs of a modern workforce.

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