

## **Anti-Modern Slavery Policy**

### **1. Policy Statement**

Genesis Training Group Limited (Genesis) maintains relationships with many different organisations in its supply chain, as well as employing large numbers of people.

Genesis is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an equal-opportunities employer, Genesis is committed to creating and ensuring a non-discriminatory and respectful working environment for its staff. Genesis wants all its staff to feel confident that they can expose wrongdoing without any risk to themselves.

Genesis expect all who have, or seek to have, a business relationship with Genesis to familiarise themselves with our anti-slavery statement and to act in accordance with its contents at all times.

### **2. Aims of the Policy**

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or 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.

Genesis have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or supply chain.

### **3. Scope of the Policy**

Genesis are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Genesis expect our suppliers to hold their own suppliers to the same high standards.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our

supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:

(i) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas.

(ii) engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.

(iii) where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.

(iv) introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

#### **4. Responsibility for the Policy**

Ultimate responsibility for the prevention of modern slavery rests with Genesis Training Group's executive board. The executive board of directors have overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on its contents and the issue of modern slavery.

#### **5. Protection for those raising a concern**

Genesis aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery, of whatever form, is, or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

## 6. Raising a concern

### 6.1 Internal Reporting

As a first step employees should normally raise concerns with their immediate line manager, or contract manager where applicable. However, depending on the seriousness and sensitivity of the issue and the nature of the concern, employees may feel unable to raise the matter with their line manager and in this instance should approach the next level of management. The guiding rule is that employees should address their complaint to the level of management who they believe is not involved in the matter.

If employees feel unable to raise the matter with their line manager, or their superior, the matter should be raised with Director, Roy Williams.

### 6.2 External Reporting

It is recognised that there may be circumstances where employees feel it necessary to raise their concerns outside the business and in these circumstances, employees have a number of external avenues open to them.

### 6.3 Investigating Procedure

Action taken by Genesis will depend upon the nature of the concern. Disclosures will be assessed to:

- Determine whether a further investigation should be conducted.
- Determine the form the investigation should take and whether the Police should be involved.
- Appoint an investigating officer to undertake the investigation.


### Version Control

Version History	Content Changed
1 – Jan 2021	Policy produced
2 – Oct 2021	Review and Branding change

### Review and Ratification

Next Review Date	Reason for Review
Oct 2022	Full review

**Dated:** October 2021

**Signed:** 

**Name:** Joseph Lennard

**Position:** Operations Director