


GCM SERVICES MANUAL

Document Title:	Anti-Slavery & Human Trafficking Policy
Document Reference:	GCM Pol 13
Effective From:	4.8.20
Issue Number:	2
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Approved By:	 Gordon C Marshall, MIDE, Managing Director, GCM Services Scotland Ltd

1.0 ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015. 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 in order to exploit them for personal or commercial gain. This document sets out the policy of the Company with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

1.2 The Company 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 business or those of our suppliers.

2.0 STEPS FOR THE PREVENTION OF MODERN SLAVERY

2.1 We 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 obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our subcontractors, suppliers and other business partners with specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We require our suppliers to hold their own suppliers to the same high standards.

2.2 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 measure:

a) engage with our suppliers both to convey to them our Anti-Slavery and Human Trafficking Policy and to confirm they ensure modern slavery is not occurring in their businesses and their supply chain.

b) 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.

3.0 RESPONSIBILITY FOR THE POLICY

3.1 Overall responsibility for the prevention of modern slavery rests with the Managing Director who has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

3.2 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 it and the issue of modern slavery.

3.3 This policy is also included as part of the GCM Employee Handbook.

4.0 ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

4.1 Internal


Employees are encouraged to raise any concerns about suspected modern slavery associated with the Company or our suppliers and should do this through their line manager.

4.2 External

Members of the public or people not employed by the Company are to write, in confidence, to the Quality Manager at the registered office to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

4.3 We aim 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 as a result 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. Please see our Whistleblowing Policy (GCM Pol 11) for further information.

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4.4 The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

5.0 BREACHES OF THIS POLICY

5.1 If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.

5.2 We reserve the right terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

6.0 COMMUNICATION AND AWARENESS OF THIS POLICY

6.1 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.