



GEODEC Limited Modern Slavery and Human Trafficking Policy

Effective Date: November 2025

Reviewed By: GEODEC Limited

Next Review Date: November 2026

Approved By: George Matthews, Director

1. Purpose and Commitment

GEODEC Limited is fully committed to preventing acts of modern slavery, servitude, forced labour, and human trafficking in any part of our business or supply chain.

We uphold the principles of the **Modern Slavery Act 2015**, ensuring that all persons working for or on behalf of GEODEC Limited are treated fairly, lawfully, and with respect for their fundamental human rights.

We adopt a **zero-tolerance approach** to modern slavery and expect the same high standards from all of our contractors, suppliers, and business partners.

2. Legal Framework

This policy is designed to comply with the following UK legislation and guidance:

- **Modern Slavery Act 2015**
- **Human Rights Act 1998**
- **Employment Rights Act 1996**
- **National Minimum Wage Act 1998**
- **Equality Act 2010**
- **Health and Safety at Work Act 1974**
- **Gangmasters (Licensing) Act 2004**
- **ILO Conventions on Forced Labour and Child Labour**

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VAT Number: 507501225

Registered in England and Wales



GEODEC Limited also supports the principles of the **United Nations Universal Declaration of Human Rights** and the **International Labour Organisation (ILO) Fundamental Conventions**.

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3. Scope

This policy applies to:

- All employees, subcontractors, agency workers, consultants, suppliers, and business partners engaged by GEODEC Limited.
- All areas of operation including painting, decorating, interior design, procurement, logistics, and subcontracted services.

4. Policy Statement

GEODEC Limited strictly prohibits:

- The use of forced, bonded, or involuntary labour in any form.
- The employment of persons under the **legal minimum age** in accordance with UK law.
- Any conduct that involves human trafficking or exploitation.
- Retention of workers' passports, identification, or wages.
- Any threats, coercion, or abuse of power to compel labour or service.

All workers must be employed voluntarily, paid fairly, and treated with dignity.

5. Responsibilities

Director / Senior Management:

- Ensure full implementation of this policy and compliance with the Modern Slavery Act 2015.
- Oversee due diligence processes across all projects and supply chains.
- Ensure all staff and subcontractors are aware of this policy.

Managers / Supervisors:

- Verify identity, right-to-work status, and contractual terms for all workers.

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- Monitor sites to ensure no evidence of exploitation, coercion, or unfair treatment.
- Report any concerns immediately to senior management.

Employees / Subcontractors:

- Must not engage in, support, or ignore modern slavery practices.
- Have a duty to report any suspicions or breaches confidentially.

6. Due Diligence Procedures

GEODEC Limited undertakes due diligence to mitigate modern slavery risks by:

- Requiring **proof of right to work in the UK** for all personnel.
- Conducting background and identity checks on subcontractors and agency workers.
- Using suppliers and labour providers who are compliant with UK employment law.
- Including **anti-slavery and ethical conduct clauses** in all supplier and subcontractor agreements.
- Periodically auditing high-risk suppliers and requesting written confirmations of compliance.
- Avoiding cash-in-hand payments and ensuring all wages meet or exceed the **National Minimum Wage**.

7. Risk Assessment and Mitigation

GEODEC Limited identifies potential risk areas, particularly within:

- Temporary or subcontracted labour.
- Supply chains involving imported materials or overseas manufacturing.
- Partnerships with smaller or informal labour providers.

We mitigate these risks through:

- Pre-qualification questionnaires and supplier vetting.
- Written contractual obligations.
- Regular monitoring and spot checks on-site.

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- Immediate corrective action or contract termination if a breach is identified.

8. Reporting Concerns

GEODEC Limited promotes an open and safe reporting culture.

If any employee, subcontractor, or supplier suspects modern slavery or unethical labour practices, they should report it immediately by:

- **Email:** Office@geodec.co.uk
- **Phone:** 07908 403229/01634730140
- Or directly to **George Matthews (Director)** in person.

All reports will be treated **confidentially**, investigated promptly, and appropriate action will be taken. GEODEC Limited will never tolerate victimisation or retaliation against whistleblowers.

If criminal activity is suspected, GEODEC Limited will notify the relevant authorities, including the **Gangmasters and Labour Abuse Authority (GLAA)**, the **Police**, or the **Home Office**.

9. Training and Awareness

All employees, supervisors, and subcontractors are made aware of this policy and their obligations during induction or contract onboarding.

Additional training may be provided to staff with responsibility for recruitment, procurement, or supply chain management.

10. Breach of Policy

Any employee, subcontractor, or supplier found to be involved in modern slavery, directly or indirectly, will face:

- **Immediate termination of contract or employment;** and
- **Referral to the relevant enforcement authorities.**

GEODEC Limited will cooperate fully with any investigation and reserves the right to pursue civil or criminal action if appropriate.

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11. Review and Publication

This policy will be reviewed annually to ensure ongoing compliance with UK law and best practice standards.

It is available on request and may be published on GEODEC Limited official website: www.geodec.co.uk.

Signed By:

George Ryan Matthews

17th November 2025

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