



Policy Document

Modern Slavery and Human Trafficking Policy

At **GSFM Facilities Limited** is committed to ensuring that modern slavery and human trafficking do not occur within our business operations or supply chains. We recognize our responsibility under the **Modern Slavery Act 2015** to take a robust approach to addressing modern slavery and ensuring that our business operates ethically and with integrity at all times. We adopt a zero-tolerance approach to modern slavery, forced labour, child labour, and human trafficking, and we expect the same from our suppliers, contractors, and business partners.

The purpose of this policy is to set out GSFM Facilities Limited's commitment to preventing modern slavery and human trafficking in our operations and supply chains. Define the processes and responsibilities to ensure compliance with the Modern Slavery Act 2015. Provide guidance on how employees and third parties can raise concerns regarding modern slavery.

This policy applies to all employees, contractors, suppliers, and any third parties working with or on behalf of GSFM Facilities Limited. We are committed to ensuring that no one in our business or supply chain is subjected to modern slavery in any form.

We are committed to:

1. Prohibiting modern slavery and human trafficking in any form within our business and supply chains.
2. Conducting risk assessments of our supply chains and business operations to identify and address any risks related to modern slavery.
3. Ensuring that our suppliers, contractors, and business partners adhere to our ethical standards by implementing appropriate due diligence processes.
4. Raising awareness of modern slavery and providing training to employees to help identify and prevent exploitation.
5. Monitoring compliance with this policy through regular reviews, audits, and assessments.

GSFM Facilities Limited to prevent modern slavery and human trafficking will:

1. Conduct risk assessments to identify areas in our supply chains where the risk of modern slavery may be higher.
2. Evaluate and select suppliers based on their commitment to ethical practices, including adherence to human rights and anti-slavery laws.
3. Include anti-slavery provisions in contracts with suppliers, requiring them to comply with the Modern Slavery Act 2015.
4. Monitor and audit suppliers to ensure compliance with modern slavery laws and take appropriate action where issues are identified



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Employee Responsibilities

All employees of GSFM Facilities Limited have a responsibility to encourages all employees

1. Be aware of and adhere to this policy.
2. Report any concerns or suspicions of modern slavery or human trafficking, whether within our own company or in the supply chain. Reports can be made confidentially and anonymously
3. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.
4. Take part in training to understand how to recognize signs of modern slavery and what steps to take if they suspect it is occurring.
5. Maintain high standards of integrity and transparency in their dealings with suppliers and third parties.

Supplier and Partner Expectations

GSFM Facilities Limited expects all suppliers, contractors, and business partners to:

1. Adopt the same zero-tolerance approach to modern slavery as set out in this policy.
2. Implement effective systems and controls to ensure that slavery and human trafficking do not take place within their supply chains.
3. Provide evidence of their commitment to preventing modern slavery, including compliance with the Modern Slavery Act 2015, upon request.
4. Cooperate with audits and assessments conducted by our company to ensure ongoing compliance.

Failure by a supplier or partner to comply with the provisions of this policy may result in the termination of the business relationship.

Training and Awareness and Communication

GSFM Facilities Limited will provide training to all employees, especially those involved in procurement, supply chain management, and HR, to help them:

1. Understand the risks of modern slavery and human trafficking.
2. Recognize the signs of exploitation in the workplace or supply chain.
3. Know how to report concerns and take action if modern slavery is suspected.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.



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Responsibility for the policy

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

The HR department has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and auditing internal control systems, policies, and procedures to ensure they are effective in preventing or remediating the risk of modern slavery in the workplace. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

The Operations Director is responsible for ensuring that labour standards of our supply chain correlate with those of GSFM Facilities Limited and that suitable due diligence and audit processes are undertaken.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Breach of the policy


Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors, and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

This policy will be reviewed annually to ensure it remains relevant and effective in preventing modern slavery and human trafficking.

Policy Owner

Gary Strachan
Director of Operations

Signature 

Date 01/01/2025