

GUK Anti-Slavery & Human Trafficking Policy

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1 Introduction

GUK is committed to improving our working practices to combat slavery and human trafficking in accordance with our obligations under the Modern Slavery Act 2015. We have established robust procedures to ensure that all stakeholders are aware of their individual obligations in combating this insidious and growing problem.

2 Scope

This policy applies to everyone employed by GUK, including all companies and individuals providing goods and services as part of the GUK supply chain.

3 Policy Statement

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. GUK is committed to ensuring that slavery or human trafficking in any form does not have a place in our business or any part of our supply chain. This policy reflects our commitment to acting ethically and with integrity in all our business relationships including the implementation, enforcement and maintenance of effective controls.

4 Due Diligence Processes

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

All stakeholders have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in such a manner that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all stakeholder obligations under their contract of employment, or service supply agreement.

Recognising our statutory obligation to ensure that slavery and human trafficking has no place in our business or supply chain; we have implemented the following measures:

- Conduct risk assessments to determine what 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
- 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
- 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.

5 Responsibility for the Policy

Responsibility for the prevention of incidents involving allegations of slavery and human trafficking ultimately resides with GUK's leadership. The 'Board' retains responsibility for ensuring that this policy is implemented in accordance with our legal and ethical obligations. Individual Managers are responsible for ensuring that those reporting to them understand and comply with this policy and are provided with adequate, regular and appropriate training on the issue of modern slavery.

6 Reporting of Concerns

As an organisation we encourage all stakeholders to communicate concerns in relation to this or any other area and as such would support any attempt at disclosure either direct or anonymously. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery in whatever form is, or may be taking place in any part of our business or in any of our supply chains.

7 Communication & Awareness

As an organisation we have adopted a zero tolerance approach to slavery and trafficking in all its forms, it is therefore essential that all stakeholders are made aware of this policy prior to the formalisation or commencement of employment or commercial relations. Communication is conducted via the following means:

- Formal induction of new employees
- During performance appraisals
- Training via the GUK online Academy
- As part of the due diligence and selection process for new suppliers
- As part of tender and bid submissions

8 Review

This policy will be reviewed by the company 'Board' on an annual basis or more frequently in response to changes in legislation.