



## **Modern Slavery Policy**

## Contents

1.0 Scope and Exclusions .....	3
2.0 Policy Statement .....	3
3.0 Roles and Responsibilities .....	3
4.0 Implementation of Policy .....	4
4.0 Documentation Control.....	4
Appendix 1 – Modern Slavery Information Sheet .....	5

## **1.0 Scope and Exclusions**

This policy applies to all gbpartnerships group (gbp group) colleagues.

## **2.0 Policy Statement**

gbp group recognises its environmental, health & safety and employment responsibilities and devotes appropriate time and resources towards monitoring compliance and improving existing standards. gbp group have policies which comply with relevant UK and European Human Rights and employment legislation.

As such, gbp group is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

gbp group are committed to ensuring that our business and supply chain is free of any slavery and/or human trafficking. We will not knowingly support and/or do business with any suppliers who are involved in slavery.

## **3.0 Roles and Responsibilities**

All colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of gbp group or its wider stakeholders at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your Manager or the Group Services and Quality Director as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any of our suppliers constitutes any of the various forms of modern slavery, raise it with your Manager or the Group Services and Quality Director.

Training on this policy, and on the risk gbp group business faces from modern slavery in its supply chains, will be provided as necessary.

## 4.0 Implementation of Policy

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

Should any supplier be found in active participation of modern slavery, gbp group will seek to legally terminate all contracts with them immediately and move to other suppliers.

If the supplier was not aware of the breach, then gbp group may still choose to terminate the relationship with the partner. A decision on this will be made by the executive team based on the risk to the company and the severity and duration of the breach.

## 4.0 Documentation Control

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## Appendix 1 – Modern Slavery Information Sheet

### What is Modern Slavery ?

Modern Slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour and criminal exploitation.

Victims of modern slavery can be any age, gender, nationality and ethnicity. They are tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation. They may not recognise themselves as a victim.

The construction and cleaning industries are among those most affected by this crime, according to the National Crime Agency.

gbp group will not knowingly support and/or do business with any suppliers who are involved in slavery.

Do workers look unkempt, wear the same clothes every day or wear clothes not suitable for work?	Do workers appear to be under the control of someone else?
Are workers movements controlled?	Are workers reluctant to talk to strangers?
Are workers reluctant to interact with others?	Does someone speak for the workers?
Do workers have personal identification on them?	Does the workplace look like it is being used for accommodation?
Are workers distrustful of and reluctant to talk to the authorities?	Are workers picked up and dropped off for work in groups?



How to spot modern slavery – if you feel something isn't right, ask yourself these questions

←

gbp group recognise their wider social responsibility, so if you see any of the signs of modern slavery contact the Modern Slavery Helpline confidentially on [08000 121 700](tel:08000121700)

Also, inform your line manager and the Group Services and Quality Director.