



# Modern Slavery & Human Trafficking Statement

Financial Year Ending May 2023

# Modern Slavery & Human Trafficking Statement 2023

It is the policy of Globus Group of Companies\* not to accept any kind of human trafficking or slavery in its supply chain or any part of its business.

Globus Group of Companies complies with UK law governing slavery and human trafficking.

Globus Group of Companies is wholly committed to respecting human rights across both our own operations and our supply chain. We also take appropriate training to ensure that all our employees understand our policy of eliminating forced labour, child labour and human trafficking and we require our suppliers to read, sign and adhere to our Ethical Guide within their operations and their own supply chains.

The effectiveness of this policy is regularly reviewed and monitored through our processes and risk management procedures. Globus Group maintain a Labour Standards Assurance System that is audited on an annual basis by a third party assessment body.

**Andrew Morris**  
**Director**

27<sup>th</sup> November 2023

\*Globus Group of Companies comprises Globus (Shetland) Ltd, Globus EMEA FZE, Globus EMEA Ltd, Alpha Solway Ltd and ENHA GmbH

This statement covers the period 1<sup>st</sup> June 2022 - 31<sup>st</sup> May 2023 and was approved by the Company Board of Directors 27<sup>th</sup> November 2023 and has been signed by Andrew Morris, Director. This statement is published on the Globus Group website as required by the UK Modern Slavery Act 2015.

# Globus Group's Slavery & Human Trafficking Risks

## Risks in our Direct Operations

The majority of our manufacturing business is based in Europe. In our view, the profile of our operations in terms of locations and roles therefore means that the risks of modern slavery are very low, as it is often in our direct control. However, because of our global footprint and diversity of sectors, we know that human rights abuses may exist in any market in which we operate. All Globus Group companies have developed and implemented policies and procedures in line with the local legislative requirements and Group Policies with a view to ensuring that our people as well as agency workers and other sub-contracted labour are treated fairly and equally. Where we have agency workers, we use well established and reputable agencies.

## Risks in our Supply Chain

We do not directly control the treatment of workers within our supply chain.

There is a risk that supply partners do not uphold the same standards of workforce protection that we do. We have policies to select and validate our partners, and to identify and understand the risks that maybe involved, from which we can decide on a course of action.

# Policies in Relation to Slavery & Human Trafficking

## The Globus Group Modern Slavery & Human Trafficking Policy & Ethical Guide

These documents have been prepared in order to give guidance and instruction on the minimum and recommended standards acceptable to Globus Group in the manufacture of products and procured services globally.

Suppliers are expected to comply with national and other applicable law and, where the provisions of law and the content of this document address the same subject, to apply that provision which affords the greater protection.

Human Resource policies, including the Whistle Blowing Policy address modern slavery and human trafficking, providing both guidance for our recruitment teams and employees.

## Monitoring our Policies

Implementation and effectiveness of our policies for internal staff are monitored by the management team and is reviewed regularly by external auditors to the requirements of the Labour Standards and Assurance System (LSAS).

Supply chain Monitoring, such as execution and follow up to social risk audits, is undertaken by third party providers.

Regular reports are submitted to, and reviewed by, the Globus Group Senior Management summarising the audits that have been carried out, the material issues that have been identified from such audits and the follow up actions taken to address such issues.

## Staff Training

One of our focus areas continues to be on training our people and raising awareness of modern slavery. The training helps our employees to understand and recognise social risk issues that might occur in our supply chain and informs them of the appropriate actions that should be taken if the need arises.







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Protection



Respiratory  
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Protection



Hearing  
Protection



Hand  
Protection



Protective  
Clothing

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