

Modern Slavery and Human Trafficking Policy

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1. Introduction

Modern slavery is a broad term that covers various crimes, including human trafficking, slavery, servitude, and forced labour. It describes situations where individuals are exploited and unable to leave due to coercion, force, abuse of vulnerability, deception, or other controlling factors. This illegal practice involves the exploitation of people for personal or commercial gain and constitutes a serious violation of fundamental human rights.

Approximately 50 million people worldwide are believed to be trapped in modern slavery, enduring conditions of forced labour, human trafficking, servitude, and exploitation. Many of these individuals work in industries that supply everyday goods and services, including agriculture, manufacturing, construction, hospitality, and domestic work.

Forced labour is particularly prevalent in global supply chains, where vulnerable workers often from marginalized communities—are subjected to poor wages, unsafe working conditions, debt bondage, and restricted freedom. From the clothes we wear and the food we eat to the electronic devices we use; many products may unknowingly be linked to modern slavery.

Factors such as poverty, lack of education, conflict, and weak labour protections contribute to the persistence of modern slavery. Perpetrators often exploit these vulnerabilities through deception, coercion, and threats, making it difficult for victims to escape.

Addressing this issue requires a coordinated global effort from governments, businesses, and consumers to strengthen regulations, enforce ethical labour practices, and promote transparency within supply chains. By raising awareness and taking collective action, societies can work towards eradicating modern slavery and ensuring fair and humane treatment for all workers.

Worldwide, the International Labour Organization estimates hundreds of billions of illegal profits are generated by traffickers per year. Unscrupulous businesses who use slave labour undercut businesses and if this horrendous crime is to be eradicated from the UK and the rest of the world, government and businesses must work together.

2. Preventive Strategy

Geemal takes a proactive stance in addressing modern slavery, corruption, and bribery, both directly and indirectly linked to these illegal activities. We maintain a zero-tolerance policy towards such exploitation

while fostering an open and transparent relationship with our suppliers. This approach ensures that we actively identify and address any occurrences of modern slavery within our supply chain.

Modern slavery is widespread and may be present within the supply chains of goods and services procured by public bodies. Geemal is dedicated to preventing taxpayer funds from inadvertently supporting this illegal practice and remains committed to safeguarding vulnerable workers within its supply chains from exploitation and harm.

Geemal, fully supports the government's objectives to eradicate modern slavery and human trafficking. Our organization upholds the principle that every individual deserves to be treated with dignity and respect in all situations and at all times. According to Geemal's Behaviour Code, all individuals working for Geemal, whether at Westminster or elsewhere, have a responsibility to uphold the highest ethical standards of integrity, professionalism, and mutual respect.

3. Definitions

Modern slavery is the term used within the UK to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking and the associated criminal offences are defined within the Modern Slavery Act 2015 (the 'Act').

Human trafficking is where a person arranges, or facilitates, the travel of another person with a view to that person being exploited.

4. Policy Aims

This policy provides a framework to ensure:

- ❖ All members of the Geemal Community (as defined in section 5.3) understand and are aware of their responsibilities in relation to modern slavery.
- ❖ The development of a strategic approach to identifying and tackling any modern slavery within Geemal's supply chains.
- ❖ The implementation of robust, transparent and proportionate governance and assurance processes.
- ❖ Reporting of instances (or concerns) of modern slavery.

5. Responsibilities and Accountabilities

Geemal acknowledges its responsibility to uphold ethical business practices and implement policies that safeguard workers from abuse or exploitation.

Preventing, identifying, and reporting modern slavery within Geemal or its supply chain is the responsibility of everyone working for us or on our behalf. All passholders must refrain from engaging in, facilitating, or neglecting to report any activity that could lead to or indicate a violation of this policy.

Therefore, this policy applies to all persons working for Geemal or on behalf of Geemal, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents and contractors.

The Board of Directors have overall responsibility for ensuring this policy complies with the business' legal and ethical obligations, and that all those under our control comply with it. The Social Sustainability Team currently has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any related queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

6. Contractor Responsibilities

Geemal requires all organisations with whom it is engaged to ensure that their goods, services, materials and labour-related supply chains:

- ❖ Fully comply with the Act.
 - ❖ Are clear, transparent, accountable and auditable.
 - ❖ Are free from ethical ambiguities.
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- Geemal expects that its contractors operate to the highest level of ethical standards and will hold their own suppliers to the same high standards.
 - All contractors must pay their dedicated staff working in Manchester at least the Manchester Living Wage, or the UK Living Wage for dedicated staff working outside Manchester. Paying a Living Wage is a protective mechanism against exploitation as it ensures staff members are paid sufficiently to meet their basic needs.

- Contractors who supply goods or services deemed to be at particular risk of modern slavery (or have a high contract value with Geemal) may be invited to complete the Government [Modern Slavery Assessment Tool](#). The business may also encourage contractors that do not fall within the scope of the Act to complete this assessment.
- This assessment will help Geemal to assess the capacity of the contractor to manage and prevent the risks of modern slavery. It will also support Geemal to work in partnership with contractors to improve protections and reduce the risk of exploitation of workers in their supply chains.
- Geemal acknowledges that contractors may be at different stages of their journey towards having more ethical supply chains but expects to see them demonstrate continuous improvement in how modern slavery risks are mitigated.
- Geemal may require contractors who engage workers through a third party to obtain that third party's agreement to adhere to this policy and demonstrate how they seek to tackle any modern slavery within their supply chain.
- Consistent with this approach, Geemal may require employment and recruitment agencies, and other third parties supplying workers to teams in either Administration, to demonstrate their compliance with this policy.

7. Awareness and Training

Geemal will raise awareness of this policy (and the Act) by notifying contractors, suppliers and other organisations with which we regularly engage.

The policy will be published on the Company website and other required websites for transparency.

Geemal will look for opportunities to raise awareness of modern slavery and human rights abuses throughout the Geemal working community. Appropriate training and guidance will be provided for all staff of both Geemal and parent companies.

Training will include how to identify the risks of modern slavery and ensure that suspected instances are handled correctly.

Supplementary training will be made available for commercial and procurement staff. This training will be mandatory for contract managers responsible for high-risk or high-value contracts.

Geemal will offer information, advice, and guidance on modern slavery to contractors. Where possible, Geemal may also provide modern slavery training to contractors; however, contractors will remain accountable under the Act and bear the primary responsibility for delivering internal training to their staff.

Geemal will keep records of all business community members who have successfully completed modern slavery training

8. Accountability and Openness

Geemal is committed to maintaining high standards of integrity by ensuring transparency in its operations and supply chains. Through regular assessments, clear reporting mechanisms, and open communication, Geemal upholds accountability in preventing modern slavery and unethical practices.

Geemal has committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within either Administration or in any of the business and Parent company's supply chains.

Geemal adopts a risk-based approach to procurement, contract management, and supply chain oversight concerning modern slavery, ensuring these processes are continuously reviewed and improved.

As part of ongoing risk assessment and due diligence processes, Geemal will consider whether circumstances warrant the auditing of contractors to demonstrate their compliance with this policy

As part of its continuous risk assessment and due diligence processes, Geemal will evaluate whether auditing contractors is necessary to verify their compliance with this policy.

To supplement this policy, Geemal, will voluntarily publish an annual Modern Slavery Statement for each financial year, which will include details of activities undertaken by Geemal and its supply chains to combat modern slavery.

The Statement will be published on the [Geemal Resourcing – recruitment that makes finding work and talent easy](#) and the Modern Slavery Registry within 6 months after the last financial year end.

Action in support of this policy will be regularly reported to the Board of Directors.

9. Workplace Equality Network Support

Geemal will collaborate closely with the Workplace Equality Networks (WENs) to assess potential vulnerabilities of workers within its supply chain to exploitation.

Geemal may consult required authorities if there is sign of workers been vulnerable due to their immigration status, gender, ethnicity, age or levels of educational attainment. Workers on temporary and seasonal contracts are also associated with being at higher risk due to the additional risk of exploitation through labour intermediaries.

10. Non – Compliance, Reporting and Victim Support

If any Staff or Contractors of the Geemal is discovered to have breached this policy, then appropriate action will be taken.

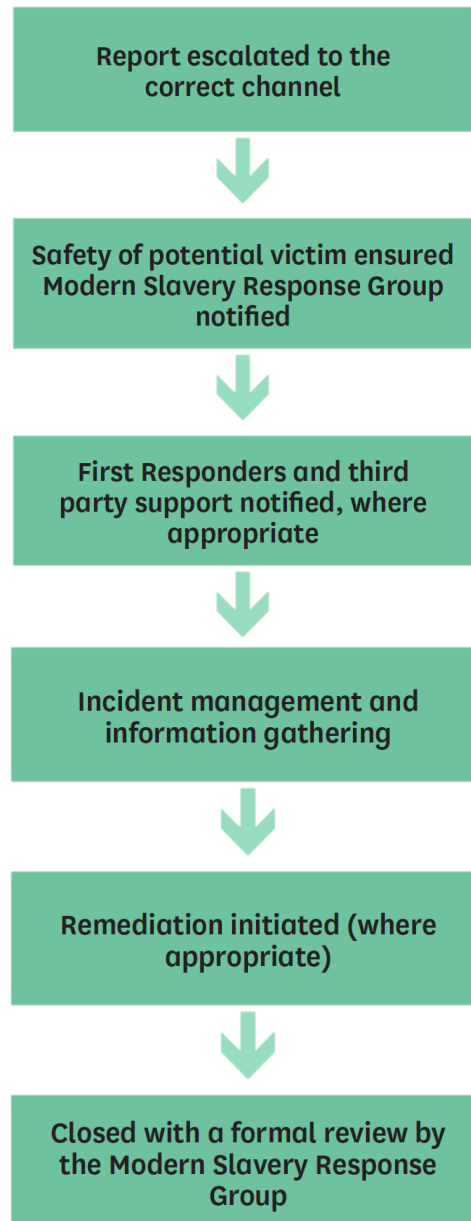
If any contractor is found to have breached this policy, then appropriate action will be taken; this may range from considering the possibility of breaches being remediated, to terminating agreements.

Individuals who have reasonable suspicion or evidence of modern slavery or noncompliance with the Act must immediately report their concerns on 020 7219 5311 following Geemal’s Modern Slavery Escalation & Remediation Process (E&R). See an overview of the E&R process on page 9.

If the incident has a high level of threat or risk of harm, individuals must always refer the case to the emergency services on 999 as a first port of call. Children should always be referred into the authorities immediately.

In alignment with our Remediation Principles outlined in the E&R process, Geemal adopts a victim-centred approach to safeguard victims of modern slavery from further harm or vulnerability. Each case will be handled individually, taking into account specific circumstances. We prioritize collaboration with our supply chain, reserving contract termination as a last resort. Additionally, we are committed to a multi-stakeholder approach, continuously learning and adapting based on our experiences. Suppliers are expected to adhere to these Remediation Principles when addressing supply chain incidents that require remediation.

Overview of the Escalation & Remediation process:



If you would like to raise a concern about a suspicion you have outside of work (at home or in your community):

- Contact the UK Modern Slavery Helpline on 080 0012 1700 or [report it online](#)
- Contact the Victim Support Helpline on 080 8168 9111
- Visit the [Victim Support website](#)

11. Policy Review

This policy will be reviewed on an annual basis, to establish whether Geemal's approach continues to follow best practice by:

- Assessing and interpreting any recent or emerging case law and best practice.
- Benchmarking Geemal's activities against statements and action plans undertaken by similar public and private organisations.
- Re-evaluating the risk of non-compliance as part of our annual risk management and assurance processes.

Signed:



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