

MODERN SLAVERY AND ETHICAL TRADING STATEMENT 2023

The Company supports the Modern Slavery Act principles and ethical trading and is implementing, monitoring and reviewing its policies and practices to ensure that none of the Company's practices and processes directly or indirectly exploits workers or abuses their human rights.

To this end the company makes the following declarations.

- Pays all its workers at or above the UK statutory minimum wage or minimum Living Wage for those aged 25 or over.
- Applies the Working Time Regulations with regard to work breaks, opt in or out of the maximum working week, and encourages workers to take their statutory/company holiday allowance within the current holiday year.
- Where overtime is undertaken, or workers voluntarily opt out of the 48 hour working time limit, the Company will monitor the capability and fitness of workers and will curtail working hours where the impact of longer working hours is seen to have an adverse effect on the worker's health or work-life balance.
- Does not routinely use recruitment agencies, but where it does the agency used will be UK based and will be asked to produce their Modern Slavery Statement and Ethical Trading and Forced Labour Policies.
- When appointing new employees the Company will require new workers to produce evidence of their right to reside and work in the UK (Immigration, Asylum & Nationality Act 2006).
- Will require its suppliers and subcontractors who are UK or EU based to produce their Modern Slavery Statement and their Ethical Trading and Forced Labour policies.
- Will ask suppliers and subcontractors who trade or provide services outside the UK or EU to complete a more detailed enquiry and be subject to a risk assessment. Those whose assessment result in a high risk will no longer be used or be appointed as preferred providers of supplies or services
- Has an Equality & Diversity Policy and this has been amended specifically to refer to non- discrimination and non-harassment of workers because of their immigration or asylum status.
- Will not treat any worker differently in terms of pay and conditions of employment because of their immigration or asylum status.
- Will not employ or use anyone under the age of 18 unless on an approved work experience, work placement or an apprenticeship scheme.
- Will ensure that any worker under 18 years will have the specific young persons' Working Time Regulations clauses applied regarding total hours of work and length of breaks, and with regard to night work.
- Working conditions will be in accordance with the requirements of the Health & Safety at Work Act and subsequent Regulations, and this will be monitored and audited regularly. The Company extends this to review and enhance Employee Wellbeing.
- Will ensure that all workers will be given an awareness of modern slavery, ethical trading and forced labour and what their role and responsibilities are to ensure the

Company complies with the legislation and best practice. Workers will be told about the impact of slavery, human trafficking, forced labour and child labour and that it is wrong to support in any way the exploitation of workers or children.

- Will empower workers to report any concerns they have when visiting sites and about suppliers, subcontractors, or other organisations they encounter whilst on company business.
- Allows employees to belong to trade unions or not as they chose, and whilst the Company does not recognise trade unions for collective bargaining purposes it will recognise the right for trade union members to be accompanied by a trade union official in any formal procedures. If employees apply for trade union recognition the Company will follow the legal process necessary to determine if such a claim has merit.
- Audit and review all suppliers and subcontractors and risk assess.
- Agree a process to monitor and reassess suppliers and subcontractors according to a more in-depth assessment process.
- Agree a staged approach to enforce compliance or withdraw from a business relationship.
- Develop a supplier and subcontractor code of practice.
- Deliver awareness sessions for employees.
- Achieve accreditation from our key customers.
- Approve revised policies and staff handbook to incorporate modern slavery, forced labour and ethics.

Key Performance Indicators

The company will use the following KPIs during the next year to inform actions for following years:

- The number of suppliers/subcontractors approached and who have responded.
- The number of suppliers/subcontractors whose responses required more in-depth risk assessment.
- The number of suppliers/subcontractors recorded as high risk.
- The number of workers who have attended awareness sessions.
- Evaluation outcomes from the training.
- Number of modern slavery situations raised by workers/managers.
- Number of complaints passed onto enforcement agencies.

Signed on behalf of GPC Group



Grant Phillips

Managing Director

Date: 01 February 2023