

Modern Slavery Policy Statement

Tools and Tips for a progressive Workplace

1. Purpose

This Modern Slavery Policy Statement affirms our commitment to preventing modern slavery and human trafficking in all aspects of our business operations and supply chain. Our goal is to ensure that no forms of modern slavery or human trafficking occur within our organization or our suppliers.

2. Scope

This policy applies to all employees, contractors, suppliers, and partners working with or on behalf of our Company. It encompasses all aspects of our business operations and supply chain activities.

3. Definitions

- Modern Slavery: Includes practices such as slavery, servitude, forced labor, and human trafficking, where individuals are exploited for personal or commercial gain.
- Human Trafficking: The recruitment, transportation, transfer, harboring, or receipt of persons through coercion, abduction, fraud, deception, abuse of power, or the giving or receiving of payments to achieve the consent of a person having control over another person for the purpose of exploitation.

4. Policy Statement

At our Company, we are committed to acting ethically and with integrity in all our business dealings. We strive to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

5. Organizational Commitment

1. Ethical Standards: We are committed to conducting business in an ethical, legal, and socially responsible manner.
2. Policy Implementation: We will ensure that this policy is implemented and communicated effectively throughout the organization and to our suppliers and partners.
3. Compliance: We will comply with all relevant legislation, including the Modern Slavery Act 2015 and any other applicable regulations.

6. Risk Assessment and Due Diligence

1. Risk Identification: We will assess the risk of modern slavery and human trafficking within our business operations and supply chains.
2. Due Diligence: We will conduct due diligence on our suppliers and partners to ensure they adhere to our standards on modern slavery.

3. **Supplier Audits:** We will carry out audits of suppliers and contractors as part of our risk assessment process.

7. Supplier Code of Conduct

1. **Requirements:** All suppliers must adhere to our Supplier Code of Conduct, which includes prohibitions on forced labor, child labor, and any form of modern slavery.
2. **Contractual Obligations:** Suppliers will be required to confirm their compliance with this policy as part of their contractual obligations with us.
3. **Monitoring and Compliance:** We will monitor compliance through regular reviews and audits.

8. Training and Awareness

1. **Employee Training:** All employees will receive training on modern slavery, covering identification, prevention, and reporting mechanisms.
2. **Supplier Training:** We will provide or facilitate training for our suppliers on modern slavery and ethical business practices.
3. **Ongoing Awareness:** We will continue to raise awareness and educate our staff and suppliers about modern slavery.

9. Reporting and Whistleblowing

1. **Reporting Mechanisms:** We provide channels for employees and suppliers to report concerns about modern slavery confidentially and without fear of retaliation.
2. **Whistleblowing Policy:** Our Whistleblowing Policy ensures that any reports of modern slavery are taken seriously, investigated, and appropriate actions are taken.

10. Remediation

1. **Response to Incidents:** If modern slavery is identified, we will take appropriate actions, which may include terminating relationships with suppliers or partners involved.
2. **Support for Victims:** We are committed to supporting any individuals affected by modern slavery and will work with appropriate authorities and organizations to provide assistance.

11. Continuous Improvement

1. **Policy Review:** This policy will be reviewed annually to ensure its effectiveness and relevance.
2. **Feedback and Improvement:** We will seek feedback from employees, suppliers, and stakeholders to continuously improve our approach to preventing modern slavery.

12. Governance

1. **Policy Approval:** This policy is approved by the Board of Directors/Senior Management Team.

2. Responsibility: The Designated Person/Committee is responsible for the implementation, monitoring, and review of this policy.
3. Reporting: The Designated Person/Committee will report on modern slavery risks and mitigation efforts to the Board/Senior Management regularly.

13. Conclusion

We are committed to creating a work environment that is free from modern slavery and human trafficking. By adhering to this policy, we aim to promote ethical business practices and protect the rights and dignity of all individuals within our sphere of influence.

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