

GARY CLARKE COMPANY

— Modern Slavery Statement

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This statement is published in line with the Modern Slavery Act 2015, supported by the Modern Slavery: Statutory Guidance for England and Wales.

Other GCC policies that relate to this policy are: Equality, Equity, Diversity and Inclusion, Safeguarding Children, Safeguarding Adults at Risk of Harm, Dignity and Respect at Work, Code of Ethics, Behaviour and Conduct and Whistleblowing.

This policy applies to all persons working for us or on our behalf in any capacity, including employees and workers at all levels, directors, volunteers, freelance contractors, external consultants, third-party representatives and organisational partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

We will include specific objectives in our business plans to ensure that GCC acts on this policy in a relevant way.

GCC's commitment to the principles of the Modern Slavery Act 2015

GCC is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an Equal Opportunities employer, we work to create and ensure a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and HR processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

Our supply chain

We will not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

We aim not to contract with any supplier supporting modern day slavery and we include specific prohibitions against the use of forced, compulsory or trafficked labour as part of any tendering process.

We expect our suppliers to hold their own suppliers to the same high standards.

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Responsibility for the policy

The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Joint Chief Executive Officers have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it.

The prevention, detection and reporting of modern slavery in GCC or our supply chains is the responsibility of all those working for us or under our control. You must ensure that you read, understand and comply with this policy and avoid any activity that might lead to, or suggest, a breach of this policy.

Embedding the principles

We will continue to embed the principles through:

- *providing awareness training to relevant staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking,*
- *ensuring staff involved in buying or procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK,*
- *ensuring that consideration of the modern slavery risks and prevention are added to GCC's policy review process as an employer and procurer of goods and services,*
- *making sure GCC tendering and recruitment processes include references to modern slavery and human trafficking,*
- *addressing the issue of modern slavery with all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate,*
- *ensuring that staff involved in buying or tendering and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices,*
- *raising concerns about any issue or suspicion of modern slavery in GCC supply chains of any supplier tier at the earliest possible stage.*

Breaches of policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager 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 tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that

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modern slavery of whatever form is or may be taking place in any part of our own organisation or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager and if the matter is not remedied you should raise it formally using our Grievance Procedure, which can be found in the Staff Handbook.

Our Whistleblowing Policy provides that all staff should report any incident of wrongdoing within GCC to one or both the Joint CEOs who will then report it to the Board of Trustees.