

Provided and support by: 	<b>Anti-Slavery and Human Trafficking Policy</b>	Document No	
		Issue Date	
		Issue No	
		Page No	1 of 2

## Introduction

An organisation strictly prohibits the use of all types of slavery and human trafficking in our general operations and supply chain. We have an ongoing commitment to preventing slavery and human trafficking and have implemented stringent guidelines and controls to ensure that this commitment is met, satisfying legal obligations as outlined in the Modern Slavery Act 2015.

## Who this policy applies to

This policy applies to all persons working for an organisation or on behalf (in any capacity) including contractors, suppliers, directors and employees at all levels.

## What is slavery and human trafficking?

These are terms used to encompass, servitude, forced and compulsory labour, bonded and child labour. Slavery is a crime and a violation of fundamental human rights. Human trafficking is where a person arranges or facilitates the transport of another person with a view of that person being exploited.

## Our commitments as a business

The company expects everyone working with us, or on our behalf, to abide by the following measures to prevent cases of slavery and human trafficking:

- We are committed to engaging with our stakeholders and suppliers to address the risk of slavery in our operations and supply chain. We will convey to them our company policies and procedures where necessary.
- We have a zero-tolerance approach to slavery and human trafficking in our organisation and supply chains.
- The prevention, detection, and reporting of slavery and human trafficking in any part of our organisation is the responsibility of all those working for us or on our behalf. The company employees must not engage in, facilitate or fail to report any activity that might lead to a breach of this policy.
- We take a risk based approach to our contracting processes and regularly review the same. We conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- In line with our risk based approach, we may require recruitment agencies and other third parties supplying the company with staff to confirm their compliance with our code of conduct as outlined in this policy. This may be done through pre-screening techniques.
- As part of our business risk management procedures and due diligence processes, we will decide whether circumstances warrant us to carry out audits of our suppliers and contractors for their compliance with this policy.
- We expect our suppliers to hold their own suppliers to the same high standards.
- Appropriate action will be taken immediately should anyone working on the company's behalf breach this policy. The outcome will take into consideration the need to terminate such relationships and report the incident to necessary legal bodies.

*This policy applies to Gemini's and all other subsidiary companies which operate under the Gemini's Umbrella.*

Provided and support by: 	<b>Anti-Slavery and Human Trafficking Policy</b>	Document No	
		Issue Date	
		Issue No	
		Page No	2 of 2

### **Responsibility for this policy**

Ultimate responsibility for the prevention of human trafficking and slavery rests with the company's senior management. The board of directors of the company must ensure this policy is implemented effectively to ensure our legal and ethical obligations.

Management at all levels are responsible for ensuring those reporting to them understand this policy and the definitions stated therein. Training will be offered to staff where required.

### **Actions to follow to report cases of slavery or human trafficking**

Any concerns about suspected slavery or human trafficking associated with the company should be reported to a member of management in the first instance.

A company director will then be informed of the concern who will determine the company's next course of action, obtaining independent legal advice where necessary.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. The company will also accept and taken seriously those concerns that may be reported anonymously. This however could make any subsequent investigation more difficult and it is for this reason that individuals are encouraged to put their names alongside allegations.

The company also encourages any members of the public or people not employed by us to call in confidence and speak to a Director or member of management on 01670 713 444 to raise any concern or suspicion of slavery or human trafficking within the business or our supply chain.

### **Conclusion**

The companies are committed to opposing modern slavery in all its forms and preventing it by whatever means possible. We demand the same attitude of all who work for us and expect it of all whom we have business dealings with. This policy will be reviewed on a regular basis to ensure it remains current with all associated legislation.

**Signed:**

Date of Approval: