



GEMSERV MODERN SLAVERY POLICY [GEM-EXE-005]

01 SEPTEMBER 2022 – VERSION 1.0

WRITTEN BY GRC

PUBLIC

THIS DOCUMENT ENCOMPASSES INFORMATION THAT CAN BE RELEASED OUTSIDE OF GEMSERV.
THIS DOCUMENT DOES NOT INCLUDE ANY CONFIDENTIAL, PERSONAL OR SENSITIVE INFORMATION.



Gemserv[®]



CHANGE HISTORY

VERSION	STATUS	ISSUE DATE	AUTHOR	COMMENTS
V2.0	FINAL	September 2022	HR	Rebrand

DOCUMENT CONTROLS

REVIEW	ROLE	RESPONSIBILITIES	DATE
Marlene Blake	HR Manager	Approve	September 2022



GEMSERV MODERN SLAVERY POLICY

STATEMENT OF INTENT

This policy sets out Gemserv's commitment to maintaining efforts towards compliance with Modern Slavery Act 2015. This is an integral part of our Governance and Compliance framework and Code of Ethics where we confirm that we will not tolerate or condone abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected. Gemserv also operates a Whistleblowing Policy, aimed principally at employees but also available to others working partners of Gemserv which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery.

This policy is underpinned and signed off by Gemserv Board and shall apply to all Gemserv's business activities, employees & contractors, and properties.

POLICY COMMITMENT

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 to exploit them for personal and commercial gain.

Gemserv Ltd takes compliance with all legal and regulatory matters seriously and therefore maintains a zero- tolerance approach to modern slavery and human trafficking within the business, as well as from our supply chains. Gemserv acknowledges the responsibility to the Modern Slavery Act 2015 and endeavour to show complete transparency within the company, and is committed to work with its suppliers, contractors, and business partners to ensure the obligations of the Act are fulfilled.

Gemserv's senior management is committed to satisfying applicable requirements by ensuring that customer and applicable statutory and regulatory requirements are determined, understood, and consistently met. Ensure that the relevant needs and expectations of Interested Parties are considered and met if deemed to be compliance obligations.

IMPLEMENTATION AND MONITORING

Gemserv will, and expects its suppliers, to do the following:

- Not make excessive or illegal wage deductions.
- Not require employees to stay in company or broker-controlled housing.
- Allow employees to enter or leave the Company's premises freely.
- Not allow employees to work excessive overtime.
- Not use wage deductions as a disciplinary measure.
- Treat all employees with the highest mutual trust and openness establishing a culture of ethical integrity.
- Audit suppliers on the above.



The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers or goods and services to the organisation.

We expect the same high standards from all our contractors, suppliers, and other business partners. If any of our employees think they have come across an instance of modern slavery or if in fact you are a victim yourself, please follow the Whistle Blowing procedure and phone the national Modern Slavery Helpline on 0800 0121 700 for information and guidance.

Gemserv will not support or deal with any business knowingly involved in slavery or human trafficking. The Gemserv board shall take responsibility for implementing this clause.

This policy is communicated to all employees and organisations working for or on behalf of Gemserv. Employees and other organisations are expected to co-operate and assist in the implementation of this policy, whilst ensuring that their own work, so far as is reasonably practicable, is carried out without risk to themselves, others, or towards the Confidentiality, Integrity, and Availability of services we provide.

Approved by the Board September 2022.

Alex Goody
Chief Executive Officer
September 2022



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