



GEMSERV MODERN SLAVERY POLICY STATEMENT

06 AUGUST 2024

WRITTEN BY ROY BIAKPARA

PUBLIC

THIS DOCUMENT ENCOMPASSES INFORMATION THAT CAN BE RELEASED OUTSIDE OF GEMSERV.

THIS DOCUMENT DOES NOT INCLUDE ANY CONFIDENTIAL, PERSONAL OR SENSITIVE INFORMATION.

CHANGE HISTORY

VERSION	STATUS	ISSUE DATE	AUTHOR	COMMENTS
V2.0	Final	September 2022	HR	Rebrand
V2.1	Review and update	August 2023		Review
V2.2	Review and update	May 2024	GRC	Added sections
V2.3	Review and update	August 2024	GRC	Reviewed based on feedback from Crown Commercial G Cloud bid

DOCUMENT CONTROLS

REVIEW	ROLE	RESPONSIBILITIES	DATE
Marlene Blake	HR	Approve	September 2022



GEMSERV MODERN SLAVERY POLICY STATEMENT

STATEMENT OF INTENT

This policy outlines Gemserv's commitment to adhering to the Modern Slavery Act 2015. As part of our Governance and Compliance framework, we firmly oppose any form of human rights abuse within our business or supply chains. We maintain a Whistleblowing Policy, which encourages employees and partners to report any unethical practices, including human rights violations.

This policy is endorsed by the Gemserv Board and applies to all employees, contractors, and operations.

POLICY COMMITMENT

Modern slavery, including slavery, servitude, forced and compulsory labor, and human trafficking, is a crime and a violation of fundamental human rights. Gemserv Ltd upholds a zero-tolerance stance against such practices. We ensure transparency in our business and require the same from our suppliers, contractors, and business partners.

OUR APPROACH

1. Policies and Procedures:

We implement comprehensive policies including this statement, a Supplier Code of Conduct, and a Whistleblowing Policy.

2. Supplier Due Diligence:

We conduct thorough due diligence to assess and ensure compliance with our standards, focusing on employment rights and mitigating risks.

3. Training and Awareness:

We provide regular training for employees and key stakeholders to raise awareness about modern slavery and human trafficking issues. This training includes:

- **Initial Training for New Employees:** All new hires receive an introduction to our policies on human rights and modern slavery.
- **Ongoing Training and Capacity Building:** Regular refresher courses and advanced training sessions are provided to ensure all staff are up to date with the latest practices and regulations.
- **Specialised Training for Key Roles:** Staff in procurement and HR, as well as managers, receive specialised training to help them identify and respond to potential risks in supply chains and employee management.

OUR EXPECTATIONS OF SUPPLIERS

We require all suppliers and business partners to adhere to our Supplier Code of Conduct, which includes prohibitions on forced labour, child labour, and human trafficking. Suppliers must also:

- Respect workers' rights, including fair wages and safe working conditions.
- Ensure transparency in supply chains, including the disclosure of raw material origins and subcontracting arrangements.

IMPLEMENTATION AND MONITORING

Gemserv commits to:

- Regular audits of suppliers for compliance with our standards.
- Not supporting any business involved in modern slavery or human trafficking.



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.

REPORTING AND SUPPORT

Employees and others can report concerns through our Whistleblowing procedure. If you suspect any form of modern slavery, or if you are a victim, please contact the national Modern Slavery Helpline at 0800 0121 700.

This policy is communicated to all employees and associated organizations. Compliance is expected to ensure a safe and ethical work environment for all.

Approved by the Board September 2022

Alex Goody
Chief Executive
September 2022



To find out more please contact:
Governance, Risk & Compliance

T: 020 7090 1001

E: grc@gemserv.com

W: www.gemserv.com

London Office:

77 Gracechurch Street

London

EC3V 0AS

Company Reg. No: 4419878



INVESTORS IN PEOPLE
We invest in people Gold

