

# MODERN SLAVERY, HUMAN TRAFFICKING & RIGHT TO WORK POLICY & PROCEDURE



Gloster MEP are a nationwide building services contractor delivering the full range of mechanical, electrical and public health services.

## MODERN SLAVERY POLICY STATEMENT

In the conduct of our business at every level, whether internally or externally working with our colleagues, Customers or suppliers, we have defined a set of values including that of modern slavery as defined in the Modern Slavery Act 2015 and sections 15 to 20 of The Immigration, Asylum & Nationality Act 2006, that are applicable to all Gloster MEP Limited operations.

- We are committed to comply with the requirements of the Modern Slavery Act 2015 and sections 15 to 20 of The Immigration, Asylum & Nationality Act 2006.
- We are committed to implementing systems and processes to ensure that there is zero-tolerance towards any acts of modern slavery within our business and throughout our supply chains.
- We are committed to ensure that there is no slavery or human trafficking occurring within the organisation or its supply chains and that the correct Right to Work Checks are carried out on all Gloster Employees.
- We will work with our suppliers and Clients to ensure that we all ensure that the requirements of the Act are complied with.
- We will ensure that our supply chain is transparent in their obligations to the Modern Slavery Act and that we have confidence in those goods and services being provided by workers who do so at their own free will.

We recognise that the execution of our services involves labour being procured throughout our business and supply chains and understand that this entails the risk that modern slavery may take place. We acknowledge that 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. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business undertakings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in either our own business, or in any of the businesses of our supply chains.

Everyone in our supply chain has been sent this policy as part of our trading requirements. Where any of our suppliers exceed a global turnover of £36m, we reserve the right to undertake an on-site audit of their compliance. We also refer to the Government publication: Transparency in Supply Chains etc. A Practical Guide.

The Company will ensure that if requested, in writing, that a copy of the company's Modern Slavery Act Policy is issued to them within 30 days of the request.

## Mitigating Risk

As part of our initiative to identify and mitigate risk:-

- We limit the geographical scope of projects to ensure optimum supervision
- Where possible we build long standing relationships with local suppliers and Contractors and make clear our expectations of business behaviour.
- With regards to national and international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

# MODERN SALVERY, HUMAN TRAFFICKING & RIGHT TO WORK POLICY & PROCEDURE



## Training & Awareness

This policy and 3rd Party training modules are used as the framework for staff training & awareness sessions across the Group. Our employees have a personal responsibility to report any actual or suspected instances of modern slavery throughout the business or supply chain. Breaches of this policy will be dealt with under GMEP's disciplinary procedures and could lead to dismissal in applicable circumstances.

## Responsibilities

Our employees are collectively and personally responsible for the communication, understanding and practical application of this policy. This policy will be made available to all new employees at recruitment stage and to our supply chain and to any other interested parties upon request. Revisions will be communicated to those affected by the changes.

It is the responsibility of the Human Resources Manager, Via the Company's Right to Work Policy & Procedure, to ensure that all Foreign Nationals, that are engaged by the Company, are within the UK legally and they have a legal right to work.

It is the responsibility of Business Unit Leaders and Directors to ensure the supply chain complying with the requirements of Modern Slavery Act 2015 in all manners. They are required to inform the Police if they believe that a crime has been committed in relation to the Modern Slavery Act 2015.

It is the requirement of all Employees that they report any non-compliance with the Modern Slavery Act 2015, to their Immediate Responsible Manager/Operations Director.

In adhering to this policy, in particular we will: -

- Include, as part of our contracting processes within our supply chain, obligations to ensure compliance with the requirements of the Modern Slavery Act 2015.
- Encourage openness and provide support to anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is, or may be, taking place in any part of our own business or in the businesses of any of our supply chains.
- Communicate our zero-tolerance approach to modern slavery with our supply chain and business partners at the outset of our business relationship with them.

## Monitoring our effectiveness

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring and payroll systems
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

Document References:

- Right to Work Policy & Procedure
- Supply Chain & Suppliers Ethical Conduct Policy Statement

# MODERN SALVERY, HUMAN TRAFFICKING & RIGHT TO WORK POLICY & PROCEDURE

---



The Company appreciates that the risk of Slavery and Human Trafficking may change over the course of time and therefore Paul Cox; Operations Director will take responsibility for reviewing this policy and its implementation no less than annually.

For & On Behalf of Gloster MEP Ltd,

A handwritten signature in blue ink, appearing to read 'Paul Cox'.

Paul Cox Operations Director

January 2025