



BESPOKE  
MANPOWER

### Introduction

Modern Slavery Act 2015 requires Commercial organisations carrying out business in the UK with an annual turnover of at least £36 million who supply goods or services to disclose information regarding their policies to eradicate slavery and human trafficking from within their business and from their supply chain. Modern slavery is a crime and a violation of fundamental human rights. GTS Ltd has a zero-tolerance approach to modern slavery and is committed to ensuring all its business dealings and relationships are driven by moral and social responsibility. GTS Ltd prohibits the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects its suppliers to hold their own suppliers to the same high standards.

### Scope

This policy applies to all individuals working for GTS Ltd or on behalf of GTS Ltd in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

### Responsibility

The Board of Directors of the company have the overall responsibility to ensure compliance of the company's legal and ethical obligations. Equally it is the responsibility of all individuals associated with the company to understand and comply with this policy.

### Preventive Measures

GTS Ltd is committed to

- ▲ Paying people fairly and properly for their work
- ▲ Transparent and fair behaviour, such as protecting human rights
- ▲ Compliance with legislation, including fundamental rights at work including elimination of discrimination throughout employment.
- ▲ Ensuring all work carried out by staff and those associated with the company is voluntary, and not done under any threat of penalties

GTS Ltd will conduct risk assessments to determine areas within the business which are the highest along with the company's suppliers. The prevention, detection and reporting of modern slavery is the responsibility of all those working for the company or associated with the company. Staff and those associated with the company are required to avoid any activity that might lead to a breach of this policy.

Staff and associated individuals are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.

Staff responsible for procurement or managing suppliers must follow due diligence including

# MODERN SLAVERY ACT 2015

assessments and audits of product, services or geographical risks of modern slavery and human trafficking.

Staff or individuals associated with the company are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chain at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager or report it in accordance with the company's Aggrievance Policy as soon as possible. While the Aggrievance Policy is aimed principally at staff, it is also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery.

If you are unsure about whether the treatment of workers more generally, or the working conditions with any of the suppliers constitutes any of the various forms of modern slavery, raise it with your line manager or the Director of the company at the earliest.

GTS LTD encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. GTS LTD is committed to ensuring 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 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 a Director of the company immediately. If the matter is not remedied, and staff should raise it formally using the company's Grievance Procedure.

### Communication

The company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter.

### Breach of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. The company may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.