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## **3.9 – MODERN SLAVERY POLICY**

### **1.0 POLICY STATEMENT**

GBC Industrial Tools (“the Company”) recognises 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. The Company have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

The Company is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

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

### **2.0 RESPONSIBILITY**

All staff are responsible for ensuring that this they comply with our legal and ethical obligations as a company.

The Managing Director is ultimately responsible for implementing this policy and ensuring that the company complies with legal and ethical obligations overall as an organisation, that the policy is communicated to, and understood by all staff.

### **3.0 COMPLIANCE**

All staff must have this policy communicated to them and must fully understand their obligations in line with the policy.

The prevention, detection and reporting of modern slavery in any part of our business or wider supply chain is the responsibility of all employees and contractors working

under our control. You are required to avoid any activity which may lead to or suggest a breach of this policy.

In the event of a situation arising where you feel that a conflict with this policy may, or has occurred, it should be reported to the Managing Director or you direct line manager at the earliest possible time.

All employees are encouraged to raise concerns about any issue of suspicion of modern slavery occurring in any parts of the business or wider supply chain as soon as is possible. If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our business or supply chain constitutes any form of modern slavery, report it and allow for it to be investigated.

#### **4.0 COMMUNICATION OF THIS POLICY**

Where training on this policy is required the company will ensure that the appropriate level is delivered in a timely manner to employees.

Our zero-tolerance approach to modern slavery shall be communicated to all suppliers, contractors and business partners from the outset. This is done through supply chain management in the first instance., if it is felt that this need reinforcing, site visits and audit can be carried out as appropriate.

#### **5.0 BREACHES OF THIS POLICY**

Any employee who breaches this policy shall face disciplinary action, which may result in dismissal for gross misconduct.

The Company may terminate relationships with external suppliers, individuals or service providers working on our behalf, if they are found to be in breach of this policy.

As the Managing Director of GBC Industrial Tools Limited, I accept responsibility for ensuring that the Company fully complies with this policy.

Howard Lloyd



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Monday 20<sup>th</sup> Feb 2017