



## **GCH CORPORATION LTD**

### **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

#### **Introduction**

At GCH Corporation Ltd we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement.

This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our businesses, and to implement steps to prevent slavery and human trafficking during the financial year 2021.

#### **Our business and supply chains**

- GCH Corporation Ltd is a group of nine companies, all businesses in industrial manufacturing and distribution, supplying and servicing customers in the UK and Europe.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

#### **Risk assessment**

We conduct regular risk assessments of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

#### **Policies**

GCH Corporation operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of the whistle blowers.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- Purchasing Code - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.



## Supplier Due Diligence

GCH Corporation Ltd conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Authorising suppliers that fail to improve their performance in line with our requirements

We require all suppliers to verify that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to surrender their passports or work permits as a condition of employment
- They have a Modern Slavery Statement

## Awareness

GCH Corporation Ltd has raised awareness of modern slavery issues by discussing the issue at monthly board meetings and sending an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

## Training

In addition to the awareness programme, GCH Corporation has given details to all staff during meetings and followed up with emails.

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps GCH Corporation will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by ABC plc's anti-slavery policy

## Measuring how we're performing

GCH Corporation Ltd has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain.

These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?
- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?



- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?
- What are the findings of our cross-functional HR teams, which reviews how we are addressing modern slavery and human trafficking?

This statement covers 1 January to 31 December 2021 and has been approved by the CEO of GCH Corporation Ltd at the board meeting September 2020

[Signature]

**Cassie O Hutchings**

**September 2020**