



## **GEG (Holdings) Limited**

### **Modern Slavery Policy**

#### **1. POLICY STATEMENT**

**1.1** 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. GEG (Holdings) Limited and its subsidiaries (the '**Company**') are committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of the Company's supply chains.

**1.2** The Company are also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout the Company's supply chains, consistent with the Company's disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of its contractors, suppliers and other business partners, and as part of the Company's contracting processes, the Company includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and the Company expects that its suppliers will hold their own suppliers to the same high standards.

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

**1.4** This policy does not form part of any employee's contract of employment and the Company may amend it at any time.

#### **2. RESPONSIBILITY FOR THE POLICY**

**2.1** The board of directors of the Company has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under the Company's control comply with it.

**2.2** Gordon Farmer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

**2.3** Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

**2.4** You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Gordon Farmer.

#### **3. COMPLIANCE WITH THE POLICY**

**3.1** You must ensure that you read, understand and comply with this policy.

**3.2** The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for us or under the Company's control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

**3.3** You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

**3.4** You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage.

**3.5** If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with the Company's Whistleblowing Policy as soon as possible.

**3.6** If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chain constitutes any of the various forms of modern slavery, raise it with your manager.

**3.7** The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company are 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 the Company's own business or in any of the Company's 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 your manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally with Gordon Farmer or by using the Company's grievance procedures at subsidiary level.

#### **4. COMMUNICATION AND AWARENESS OF THIS POLICY**

**4.1** Training on this policy, and on the risk the business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

**4.2** The Company's commitment to addressing the issue of modern slavery in the Company's business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.

#### **5. BREACHES OF THIS POLICY**

**5.1** Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

**5.2** The Company may terminate relationships with other individuals and organisations working on the Company's behalf if they breach this policy.

#### **6. STATEMENT**

**6.1** This modern slavery policy is authorised by the Board of Directors of GEG (Holdings) Limited. It is the Board's expectation these standards, and any associated procedures, are fully adhered to. Where this may not be possible, any deviation from these standards should be clearly documented and authorised by the Board.

Signed on behalf of the Board of Directors of the Company:

A handwritten signature in black ink, appearing to be "G.F.", written in a cursive style.

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Gordon Farmer  
Director  
GEG (Holdings) Limited