

Modern Slavery & Human Trafficking Policy

Policy statement

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. At G&H, we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery does not take place anywhere in our own business or any of our supply chains.

G&H is also committed to ensuring transparency in our business and approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. G&H expects the same high standards from all of our contractors, suppliers and other business partners, and, 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, whether adults or children. We expect our suppliers to have their own suppliers to the same high standards.

About our policy

The purpose of our policy is to:

- set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
- provide information to those working for and on our behalf on identifying and reporting concerns regarding modern slavery and human trafficking.

Our policy applies to all people working for G&H or on our 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. Our policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibility for the policy

The directors at G&H are responsible for ensuring our policy complies with our legal and ethical obligations and that all those under our control comply with it.

The directors are responsible for implementing our policy, monitoring its use and effectiveness, and dealing with any queries about it.. Any concerns raised through the whistleblowing policy or any other grievance mechanism will be managed appropriately.

MODERN SLAVERY AND HUMAN TRAFFICING POLICY



G&H will ensure all suppliers are managed closely to ensure compliance with our policy and all related aspects of regulation and legislation.

Management at all levels is responsible for ensuring those reporting to them understand and comply with our policy and are given adequate and regular training.

Risks of Modern Slavery

Risks of modern slavery in our operations and supply chains can include, but are not limited to:

- Inadequate worker verification processes.
- Insufficient supplier oversight.
- Exploitation of low-paid workers.
- Poor working conditions in parts of our supply chains.
- Sectors or regions where the enforcement of worker rights is weak.

Identifying and Managing Risks

G&H of Companies will manage the risk of modern slavery through the following actions:

- Risk Assessment: Regularly conducting risk assessments to identify areas of potential exposure in our operations and supply chains.
- Due Diligence Processes: Implementing strict due diligence procedures for all new suppliers and regular reviews of existing suppliers.
- Training: Providing training to employees and management who have direct responsibility for supply chain management and procurement to recognise the risks of modern slavery and human trafficking.
- Reporting Mechanisms: Encouraging staff to report concerns about any issue or suspicion of modern slavery in any part of our business or supply chains of any supplier tier.
- Audits and Inspections: Periodically auditing suppliers and contractors to ensure compliance with our policy and the law.
- Corrective Actions: Taking appropriate actions against suppliers that violate this policy, which may include terminating contracts

Identification of Foreign Workers and Nationalities

G&H is committed to ensuring that all our employees have the legal right to work in the United Kingdom. We comply with the Immigration, Asylum & Nationality Act 2006 and adhere to the Home Office Guidance "Comprehensive Guidance for Employers on Preventing Illegal Working". Our policy outlines the procedures and controls we have in place to prevent illegal working and ensure compliance with UK immigration laws. This applies to all potential and current employees of G&H, including agency, self-employed, and subcontracted

MODERN SLAVERY AND HUMAN TRAFFICING POLICY



personnel, regardless of their role or position within the organisation.

1. During the recruitment process, all potential employees are required to provide original documents that confirm their identity and right to work in the UK.
2. Copies of these documents are retained and verified by the HR department or authorised personnel.
3. Foreign workers' nationalities are recorded and monitored to ensure compliance with immigration laws.

Compliance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006

G&H has documented controls in place to demonstrate compliance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006.

These controls include:

Verifying the identity and right to work of all employees

Retaining copies of verified documents for at least 2 years after the individual has left the employer

Conducting periodic reviews of all workers' right-to-work status

Verification of Right-to-Work Documents

1. The documents used to verify an individual's right to work are compliant with the Home Office Guidance "Comprehensive Guidance for Employers on Preventing Illegal Working".
2. Only original documents are accepted and verified by the HR department or authorised personnel.
3. Copies of all verified documents are retained securely and confidentially for at least 2 years after the individual has left the employer.

Checks and Controls

The controls and checks outlined are applicable to all potential or current employees of G&H.

1. All individuals are required to undergo the same verification process to confirm their right to work in the UK.

Periodic Reviews for Right to Work

1. Periodic reviews for the right to work of all workers, including agency temporary and seasonal employees, are conducted regularly.
2. These reviews ensure that all employees continue to have the legal right to work in the UK throughout their employment with G&H.

Non-Compliance

Failure to comply with our policy may result in disciplinary action, up to and including termination of employment.

Review and Monitoring

This process will be reviewed annually or as necessary to ensure its effectiveness and compliance with current UK immigration laws and regulations.

Document Retention

Copies of all documents used to verify the right to work of employees are securely retained for a minimum of two years after the individual has ceased employment with G&H. This ensures we maintain comprehensive records and demonstrate ongoing compliance with legal obligations.

Your responsibilities and how to raise a concern

All G&H employees and those who work on our behalf must ensure that they read, understand and comply with our policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for G&H or under our control. You must avoid any activity that might lead to or suggest a breach of our policy.

You must notify your manager as soon as possible if you believe or suspect that a breach of our policy has occurred or may occur in the future.

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

If you believe or suspect that a breach of our policy has occurred or may occur, you must notify your manager or report it per our Whistleblowing Policy as soon as possible.

If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager in the first instance.

G&H aim to encourage openness and will support anyone who raises genuine concerns in good faith under our policy, even if they are mistaken. G&H 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 our own business or any of our supply chains. Treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

Breaches of our policy

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

G&H employs a zero-tolerance attitude towards Modern Slavery and Human Trafficking. We will terminate any relationship with individuals and organisations working on our behalf if they breach our policy and cannot remediate any issues immediately.

Strong confidence must be provided to us that future issues will not arise for the company to consider any future dealings with such a party.

MODERN SLAVERY AND HUMAN TRAFFICING POLICY



SIGNED		POSITION	Director
NAME	David Davis		
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G&H consists of G&H Building Services Ltd & G&H Maintenance Ltd