

HR

Anti-Slavery and Human Trafficking Policy

Policy No. HR/047/1.0/2017

Version No. 1.0

Author	<i>Geo HR (UK)</i>	Implementation Responsibility	Geo HR (UK)
Target Audience	<i>All Full Time Team Members</i>		
Policy Category	<i>Specific to UK</i>		
Date of Initial Release	Date of Last Modification	Effective Date	Next Review Due
<i>15-May-2017</i>	NA	<i>1-April-2017</i>	
Description of Last Change	<i>Base Version</i>		

1.0 Purpose:

Modern Slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”) . Modern Slavery can occur in various forms including Servitude, Forced Labor and human trafficking, all of which have in common the deprivation of a person’s liberty by another to exploit them for the personal or commercial gain. This document sets out the policy with the aim of prevention of opportunities for modern slavery to occur within its businesses and supply chain.

2.0 Scope:

This is applicable for all members of the Organization. The Board of Directors has overall responsibility for ensuring this Policy complies with the Company’s legal and ethical obligations and that all those under its control comply with it.

The function heads 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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy.

3.0 Policy Details:

3.1 Policy Statement:

The Board of Directors has overall responsibility for ensuring this Policy complies with the Company’s legal and ethical obligations and that all those under its control comply with it.

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3.2 Compliance with the Policy

- a. Every Team member must read, understand and comply with this Policy.
- b. The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or those under its control. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- c. Every team member must notify your Manager or the HR department as soon as possible if one believes or suspect that a conflict with this Policy has occurred, or may occur in the future.
- d. Every team member is encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains of any supplier tier at the earliest possible stage.
- e. If any team member believes or suspect a breach of this Policy has occurred or that it may occur, one must notify one's Manager or the HR department or report.
- f. If any team member believes or suspect a breach of this Policy has occurred or that it may occur, one must notify one's Manager or the HR department or report it in accordance with the Company's Whistleblowing Policy as soon as possible, a copy can be found in the Company Policy Portal.
- g. If any team member is unsure about 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 one's Manager or the HR department or in accordance with the Whistleblowing Policy.
- h. 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 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 the Company's own business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If any team member believes that one has suffered any such treatment, one should inform the HR Department immediately. If the matter is not remedied, and if one is an employee, one should raise it formally using the Company's Grievance Procedure, which can be found in the Company Policy Portal.

3.3 Communication and Awareness of this Policy

Training on this Policy, identifying modern slavery and on the risk the Company's business faces from modern slavery in its supply chains, will be provided to all Managers within the Company and all employees within the Company's Human Resources function.

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

3.4 Implications for non-adherence:

Any individual who breaches this Policy will face disciplinary action, which could result in dismissal.

The company may also terminate our relationship with other individuals and organizations working on the Company’s behalf if they breach this Policy.

4.0 Exceptions:

None

5.0 Links to related Process/Procedure/Template:

None

Revision History

Ver No.	Author (Name& Designation)	Reviewer (Name & Designation)	Approver (Name & Designation)	Published Date	Sections Changed	Description of changes
1.0	Sanofar Fathima	Eranga Pathirage, Europe Geo Director	Sundarrajan N, Chief People Officer	15-May-2017	NA	NA