

Slavery and Human Trafficking Statement

At TheGFSi GROUP we have a zero tolerance to modern slavery and we are committed to implementing and enforcing effective systems and controls to ensure the wellbeing of others both those directly employed and aligned with our stakeholders. Our policy is to assess and address anti-modern slavery laws in our own business and we expect organisations with whom we do business also to adopt and enforce policies to comply with the legislation.

What is modern slavery? Modern slavery is an international crime affecting an estimated 40.3 million slaves around the world. This growing global issue transcends age, gender and ethnicities. It includes victims trafficked from overseas and vulnerable people in the UK who are forced illegally to work against their will. The Modern Slavery Act 2015 requires commercial organisations to produce a statement which sets out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain.

Our policy Our policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with the legislation.

Collaboration is imperative operated together with Leadership, Excellence, Agility, Respect and Responsibility We ensure:

- our values, which are embedded throughout our business, set the perimeters for how we expect our people to behave with colleagues, clients and the world at large
- we seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted
- our policies and procedures relating to the Modern Slavery Act are in line with our culture and values

Our procedures We have a number of procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains.

- Robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment and checks to ensure everyone employed is 16 and above
- Market-related pay and rewards reviewed annually.
- Wellbeing activities and initiatives to support our people's physical and mental wellbeing and lifestyle choices.
- An evaluation of potential and existing stakeholders recognised within our supply chain.
- In the event companies within the supply chain are paid >£100,000 and or an annual turnover of >£36m, and are therefore covered by the Modern Slavery Act, we have processes in place to evaluate and obtain confirmation of their meeting

mandatory requirements associated with this act and maintaining a healthy working environment

supporting each and all staff equally and fairly. High risk sectors such as hospitality and leisure, service, retail, construction and food and beverage industries are recognised

- A commitment to collaborate closely with suppliers to help them understand and work towards their own obligations under the Modern Slavery Act
- An Ethical Procurement, which reflects our commitment to and focus on suppliers' ethical supply chain(s)

Supporting our people Following The Act, we have enabled our people to understand more about this growing issue by setting out the steps taken by the firm as well as guiding them on how to report any suspicions they may come across within business or a personal context. We have:

- developed and shared resources, including summary documents with an overview of the Modern Slavery Act, and links to the Modern Slavery website
<https://www.gov.uk/government/collections/modern-slavery>
- signposted our people to modernslavery.co.uk to provide them with useful information on how to recognise different types of slavery, how to spot the signs and details of a telephone helpline
- included a requirement in our 2017 Annual Declaration that everyone reads and acknowledges the firm's modern slavery policy
- introduced an internal whistleblowing hotline to enable anyone who has concerns (for example, how suppliers, clients, partners or employees behave) has a means of raising their concerns confidentially.

Future performance indicators Going forward, we aim to develop and introduce:

- Focused training for those in the firm involved in contracts and procurement activities
- Methodologies to increase awareness for our people and our clients.

theGFSi GROUP shall take responsibility for this Statement and its related objectives, and review and update it in accordance with legislation.