

Modern Slavery Policy & Statement 2023



Anti-Slavery Statement

GSA's position on human rights is clear and covered in our Anti-slavery and Human Trafficking Policy and other established policies related to our code of conduct.

We respect the human rights of all our employees and those within our supply chain, and have zero tolerance of slavery and human trafficking. We are committed to ensuring that slavery, trafficking, bonded labour, forced or servile marriage, descent-based slavery and domestic work and slavery does not take place in our business or any part of our supply chain by seeking to:

- Ensure our recruitment processes are transparent and reviewed regularly, with robust processes in place for the vetting of and appointment of our people.
- Raise awareness of the issue amongst our people and our suppliers to combat the hidden nature of modern slavery.
- Challenge and support our suppliers in the effort to drive out modern slavery and human trafficking.
- Apply the spirit, as well as the letter of the law, to our internal practices.

We will produce and publish a modern slavery and human trafficking statement for each financial year. The statement will be approved by our managing director, Lisa Laird, and will be published on our website.

This statement sets out the steps which GSA has taken during the financial year ending January 2022 to help ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

Our Business

GSA was founded in August 1998 and our focus is as much on our employees that are driving the business, as providing good value for our customers.

GSA is a leading provider of cleaning and support services, operating across the UK and Ireland. We have over 25 years' of experience and expertise in retail premises, distribution centres and corporate office buildings.

In 2022, GSA became part of the Excellerate Services Group.

GSA values of

- **Reputation**
- **Reliability**
- **Responsibility**
- **Reward**

remain the same and underpin our operation. We are proud to deliver a consistent service and multiple site coverage, throughout the UK and Ireland.

GSA's head office is in Renfrewshire, Scotland and is the base for our infrastructure, finance, People Services, customer support and Health and Safety functions. We have a field-based area operational structure with the majority of our team based local or close to, the client premises where they work.

Definitions

GSA considers that modern slavery encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse, or the threat of abuse.
- Being dehumanised, treated as a commodity, or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

Potential Exposure

Due to our operational structure, supply chain and close sub-contractor relationships, we believe we have a low risk of modern slavery in our business and supply chain.

Nonetheless, GSA has taken steps to ensure that such practices do not take place in our business nor in the business of any organisation that supplies goods and/or services to us.

GSA is also subject to annual audits by various bodies; to ensure that the highest standards of health and safety and wellbeing are maintained.

Direct Employees

All employees/potential employees are required to supply referees, proof of address, bank account verification and entitlement to work in the UK. Part of the proof of identity is the production of a current passport/work permit. This document would normally be withheld by traffickers so its availability at interview would reassure us of the person's freedom.

Training is provided to all managers and supervisors to ensure that the documentation provided to verify a person's identification is authentic and not a forgery, or stolen identification from a similar looking individual.

Supplier & Subcontractor Adherence

GSA recognises its responsibility in tackling modern slavery and is committed to complying with the obligations in the Modern Slavery Act 2015. We therefore acknowledge the requirement to continuously review both internal practices and to also consider our supply chain and subcontractors to ensure their adherence to our values and ethics.

Our supply chain consists of a limited number of suppliers and subcontractors, all of which are based within the UK and Ireland. Our supply chains of sub-contractors and suppliers of goods and services cover high-level window cleaning, servicing of machinery, chemicals, IT equipment and uniforms.

GSA does not enter into business with any other organisation which knowingly endorses or has been involved in slavery or forced labour.

We ensure due diligence and take steps to make certain that that modern slavery practices do not occur within our supply chain. These include:

We obtain evidence of our supplier's arrangements, such as their policies and procedures, including their Modern Slavery Policy to ensure that the supplier does not operate contrary to the Modern Slavery Act.

- We use UK based suppliers that have been identified as having set similar standards to our own.
- Should any supplier be found to have been involved in such practices, we will terminate our agreements.
- We will ensure we refrain from making any demands from our suppliers or sub-contractors, that may result in them violating human rights.
- Our suppliers are required to inform us of any breach or potential breach of the Modern Slavery Act 2015.

Embedding the Principles

The principles are embedded by the following activities:

- Awareness training has been provided on the Modern Slavery Act 2015, which detailed appropriate action to be taken should they suspect a case of slavery or human trafficking.
- Our People Services team is responsible for ensuring efforts are made to mitigate risks of modern slavery in our business.
- GSA's Commercial Director is responsible for ensuring that labour standards of our supply chain correlate with those of GSA's, and that suitable due diligence and audit processes are undertaken.
- We will continue to embed a zero-tolerance policy towards modern slavery.
- We will continue to ensure that any employees involved in procurement and recruitment have received adequate training on modern slavery and ethical employment practices.

Training & Awareness

- Throughout the last year, we have continued to strengthen employee awareness of our stance on slavery and human trafficking through;
- The delivery of modern slavery workshops which will continue to be rolled out across the company.
- Incorporating modern slavery training into all Management inductions.
- The siting of posters and distribution of leaflets accompanying payslips to raise awareness to all employees.

Next Steps

- Continue with our activities to raise awareness of the Anti-Slavery and Human Trafficking Policy and our supplier code of conduct with our employees and suppliers.
- Further, targeted training on slavery and human trafficking by way of workshops or via our e-learning platform, as appropriate, to cover all people involved in the hiring of staff and procurement processes.
- Broaden our scope of audit process to include our supplier supply chains in particular, those operating using temporary low-skilled labour.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.



Lisa Laird
Managing Director
1 February 2023