



Modern Slavery and Human Trafficking Statement

Introduction

This Modern Slavery and Human Trafficking Statement sets down GEM Compliance Training Ltd commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of GEM Compliance Training Ltd which are as follows:

Delivering First Aid and Health & Safety training and consultancy to individuals and organisations.

The Company currently operates in the following countries: United Kingdom.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 Policies: The Director Team is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of the Company.
- 1.2 Risk assessments: The Director Team is responsible for risk assessments in respect of human rights.
- 1.3 Due diligence: The Director Team is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 **Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Employee Code of Conduct** - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

(The above policies are available upon request)

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier if requested and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including use of labour monitoring and payroll systems.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Director team endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Gavin Milligan

Position: Managing Director

Date: 12/02/2023

Signature:



Revisions

Version	Date Created	By	Reason for change
1	12th Feb 2022	Gavin Milligan	New document
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