

# Modern Slavery

Policy

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## Statement

GIMB LTD has robust procedures in place to prevent, in so far as is reasonably practicable, offences under the Modern Slavery Act 2015. It is a requirement that no employee, contractor or agent of the Company shall commit an offence if:

(a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or

(b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.



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# 1 Purpose

In compliance with the Modern Slavery Act 2015 GIMB Ltd believe that everyone is entitled to basic human rights and freedoms.

GIMB recognises that Modern slavery is a serious crime being committed across the UK, in which victims are exploited. Because of its complex and hidden nature, the signs are not always obvious.

Exposure to exploitation and modern slavery is a very real risk for vulnerable workers throughout the UK and across supply chains.

GIMB has an important role to play in recognising slavery has not gone away, the situation is not improving and action needs to be taken.

## 2 Definitions of Terms Used in this Policy

### 2.1.1 Human Trafficking

Bringing a person into a situation of exploitation through a series of actions including deceptive recruitment

### 2.1.2 Forced Labour

Any work which people are not doing voluntarily, and which is extracted under a threat or form of punishment.

### 2.1.3 Bonded Labour

Labour demanded as a means of repayment of a debt or loan.

### 2.1.4 Child Labour

Where children under the age of 18 are engaged in hazardous work.

## 3 Scope of the Policy

This policy applies to all employees of GIMB LTD, regardless of their job function.

This policy is applicable to all Company premises and sites.

This policy shall form part of the terms and conditions of employment for all direct employees of GIMB Ltd.

This policy applies to the supply chain and subcontractors working for GIMB Ltd.

## 4 Guidelines and Rules

How we combat modern slavery:

- GIMB are committed to being a responsible business and to respecting human rights.
- We make it clear that modern slavery is not acceptable in our own operations or in those companies who work with us or on our behalf.
- We only want to work with people who choose to work freely, who have rights to equal opportunity and freedom.
- We talk to experts and listen to those directly affected to enhance our understanding of modern slavery.
- We work closely with our colleagues and suppliers to uphold our standards and address risks of modern slavery including further down our supply chain and within our

subcontractors.

## 5 Organisation Structure and Supply Chains

GIMB Ltd install, maintain and repair fibre optic networks across the UK. Once GIMB have built a network we carry out customer installations to connect them to the internet. GIMB also install to customers off existing networks.

GIMB consists of 2 Directors, a SHEQ Manager, Office Manager, As-built Manager, PIA Manager and 3 directly employed engineers. The Directors are responsible for the due diligence in relation to known or suspected instances of modern slavery and human trafficking.

The rest of the workforce is made up of subcontractors who are compliance checked against a supplier/subcontractor approval process.

The supply chain is limited which comprises of PPE suppliers, office suppliers and plant hire. These companies are all verified through companies house and are nationwide supplier.

We have no business, suppliers or contractors outside the UK.

## 6 Risk Assessment and Management

Through a thorough risk assessment GIMB Ltd have determined that the risk in operations is low but will continue to monitor this and report at the monthly meetings.

## 7 Training

This policy will be briefed to all employees and available to supply chain, subcontractors, and clients upon request.

The Policy will be reviewed yearly and updated as necessary.

As the company grows we will consider additional Toolbox Talks and/or formal training such as E-Learning.