

## MODERN DAY SLAVERY ACT 2015 POLICY STATEMENT



A **KLEEMANN** Company

Guideline recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

Guideline activities are varied through multiple disciplined areas and sectors and likewise we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business. We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015 and ISO 45001:2018. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

Guideline will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to):-

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work;
- We encourage the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

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We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of Audits by Directors, Managers Safety managers and Safety Advisors.
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

### **DUE DILIGENCE:**

Going forward Guideline will implement the following actions to mitigate the risk of slavery or human trafficking in the delivery of its services and supply chain:

All existing suppliers will be asked to provide evidence of compliance with the principles of the Modern Slavery Act. Organisations with a turnover of more than £36 million will be required to provide a copy of their Slavery and Human Trafficking Statement

The tendering of new contracts will include an obligation that suppliers comply with the Modern Slavery Act

To ensure an understanding of the potential risks of modern slavery and human trafficking in delivering our services and managing our supply chain, we will provide training to relevant members of staff.

Where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

copies of all documents verified are retained for at 2 years after the individual has left the employer.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

### **Modern Day Slavery Act 2015 Policy Statement**

**This policy applies to all those employed by Guideline Lift Services Ltd**

Managing Director: Martin Oliver



Date: 07/12/2023