

Modern Slavery and Human Trafficking Policy

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Purpose and Commitment

GL events UK is committed to acting ethically and with integrity in all our business dealings and relationships. We adopt a **zero-tolerance approach** to modern slavery and human trafficking in all its forms.

We recognise that modern slavery is a complex, global issue and we are committed to taking steps to **identify, prevent, and eliminate** the risk of modern slavery occurring within our own business, our supply chains, or through any of our business relationships.

This policy applies to all persons working for or on our behalf in any capacity, including employees, directors, agency workers, contractors, consultants, suppliers, and third-party representatives.

We expect everyone we do business with to share this commitment. We will only work with organisations that fully comply, or are taking verifiable steps to comply, with the requirements of this policy.

This policy underpins and informs any statement on slavery and human trafficking produced under the transparency in supply chains requirements of **Section 54 of the Modern Slavery Act 2015 (MSA)**.

Definition of Modern Slavery

Modern slavery encompasses a range of exploitative practices, all of which involve the deprivation of a person's liberty by another for commercial or personal gain and amount to a violation of fundamental human rights.

The MSA identifies four key criminal activities:

- **Slavery:** ownership exercised over an individual.
- **Servitude:** an obligation to provide services imposed by coercion.
- **Forced and compulsory labour:** work or services not voluntarily performed, obtained under the threat of force or penalty.
- **Human trafficking:** arranging or facilitating the travel of another with a view to exploiting them.

We also recognise other exploitative practices, such as:

- **Child labour:** the exploitative employment of children, likely to be hazardous or interfere with their education, health, physical wellbeing, or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights. Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

Embedding the Policy in Practice

To give effect to this policy, GL events UK is implementing the following measures:

- **Risk Assessments:** We will undertake regular risk assessments of our operations and supply chains, taking into account geographic, sectoral, and product/service-related risks.
- **Supplier Due Diligence:** Prospective suppliers will be pre-screened as part of the supplier approval and tender processes, including review of their safeguarding controls and practices.
- **Contractual Controls:** Our contracts will include explicit prohibitions against slavery, servitude, forced or trafficked labour, and child labour. Suppliers must require their own suppliers to adhere to equivalent standards.

- **Monitoring and Auditing:** We may conduct audits, site visits, or request compliance evidence from suppliers in higher-risk areas.
- **Whistleblowing and Reporting Concerns:** We encourage all employees, contractors, and business partners to raise concerns about modern slavery. Reports may be made confidentially through our Whistleblowing Policy, directly to the UK Group HR Manager, or via [insert dedicated reporting channel].
- **Continuous Improvement:** We will review supplier relationships and internal processes regularly to strengthen our approach to identifying and mitigating modern slavery risks.

Roles and Responsibilities

- **CEO:** Overall accountability for ensuring the company complies with its legal and ethical obligations under this policy.
- **Business Unit Senior Managers:** Responsible for the day-to-day implementation of this policy, ensuring appropriate controls are in place and effective.
- **All Managers:** Responsible for ensuring that their teams comply with this policy in daily operations.
- **All Employees and Contractors:** Expected to comply fully with this policy and co-operate with any related investigations.

Training and Awareness

- Relevant staff will receive training on this policy and related processes as part of their induction.
- Regular refresher training and awareness sessions will be delivered to reinforce understanding and vigilance.
- Training will cover recognising the signs of modern slavery, understanding supply chain risks, and reporting concerns.

Breaches of this policy

- Breaches of this policy by employees, directors, or officers may result in disciplinary action, up to and including dismissal for gross misconduct.
- Breaches by suppliers, contractors, or third parties may lead to the termination of contractual arrangements.
- Everyone to whom this policy applies is expected to co-operate fully with investigations into suspected breaches.

If any part of this policy is unclear, clarification should be sought from the UK Group HR Manager.

Monitoring and Review

- This policy will be reviewed at least annually by the Senior Management Team and updated as necessary to reflect legal, industry, or organisational changes.
- Progress will be measured against defined objectives, such as:
 - % of staff trained on modern slavery awareness.
 - % of suppliers subject to due diligence checks.
 - Number of supplier audits conducted and corrective actions taken.

Status of this policy

This policy does not form part of any employee's contract of employment and may be amended at any time. All relevant parties will be notified of any significant changes.

Scott Jameson



CEO