

Policy & Procedure Manual	Ref:	P/0015
Title: Modern Slavery Policy	Revision:	1.0
Author: Rob Parsons	Date:	28/07/2021
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Approved & Authorised:



R Parsons

Director

28.07.2021

Signed

Name

Position

Date

Document Revision History			
Revision	Date	Author	Change notes
0.1	01/07/2021	R Parsons	First draft
1.0	28/07/2021		Released

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1. POLICY STATEMENT

Modern slavery is a crime resulting in an abhorrent abuse of human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

Ginger Energy Limited (“Ginger” or “the Company”) has a zero-tolerance approach to modern slavery and is committed to acting ethically with integrity and transparency in all its business dealings and relationships. This is achieved by implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The company also expects the same high standards from all its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects its suppliers will in turn hold their own suppliers to the same high standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for the Company or on the Company’s behalf in any capacity, including employees, directors, officers, agency workers, agents, contractors, consultants and business partners.

To mitigate risk the Company:

- Ensures where possible long-standing relationships with local suppliers;
- Ensures suppliers have appropriate anti-slavery and human trafficking policies;
- Takes especial care in establishing new relationships.

2. RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring that this policy complies with the company’s legal and ethical obligations.

The Anti-Slavery and Human Trafficking Officer (Rob Parsons, Director) has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery, reporting to the Board as appropriate. He is also responsible for investigation allegations of modern slavery in the Company’s business of supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

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3. COMPLIANCE

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. All are required to avoid any activity that might lead to a breach of this policy.

If anyone believes or suspects a breach of or conflict with this policy has occurred or may occur, he/she must notify their line manager or a director. All are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If anyone is unsure about whether a particular act or the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, they should raise it with their line manager.

Anyone can also report an issue/concern or gain advice from:

<https://www.modernslaveryhelpline.org/> 08000 121 700

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

4. TRAINING AND COMMUNICATION

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary so that they know how to identify exploitation and modern slavery and how to report suspected cases.

5. BREACH OF THE POLICY

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

END