

POLICY ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY



Document File Name

HR-020 Anti-slavery and Human Trafficking Policy



Date Approved by Owner/Revisions made

January 2019 V1

Subject to change. This policy should be reviewed annually but may be amended or replaced at any time.



Owner

Department: Human Resources
Position: UK HR Manager



Applies to

Unless otherwise indicated, this procedure applies to all staff, officers, directors, consultants, contractors, part or fixed-term employees, casual and agency staff and volunteers (collectively referred to as “staff” in this document. They do not form part of the terms of your contract.



Jurisdictional Coverage

All

Mandatory

Breaches of this policy may result in disciplinary action, up to and including dismissal.

Executive Statement

Genel is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Policy statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Contracts with suppliers

Contracts with all third party suppliers of goods and/or services, in order to ensure compliance with this Anti-slavery and Human Trafficking Policy, shall contain the following clause:

1. COMPLIANCE WITH ANTI-SLAVERY AND HUMAN TRAFFICKING LAWS

- 1.1 In performing its obligations under the agreement, [the Supplier's name] shall:
- 1.1.1 comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015; and
 - 1.1.2 not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015 if such activity, practice or conduct were carried out in the UK;
 - 1.1.3 include in contracts with its direct subcontractors and [Supplier's name]'s provisions which are at least as onerous as those set out in this clause [X].
 - 1.1.4 notify [add name of appropriate Genel entity] as soon as it becomes aware of any actual or suspected slavery or human trafficking in a supply chain which has a connection with this Agreement.
- 1.2 [The supplier's name] represents and warrants that at the date of this Agreement it not has been convicted of any offence involving slavery and human trafficking; nor has it been the subject of any investigation, inquiry or enforcement proceedings regarding any offence or alleged offence of or in connection with slavery and human trafficking.
- 1.3 [add name of appropriate Genel entity] may terminate the agreement with immediate effect by giving written notice to [the Supplier's name] if [the Supplier's name] commits a breach of this clause [X].

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Responsibility for the policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

The UK HR Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

All of our workforce is invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the UK HR Manager.

Compliance with the policy

All of our workforce must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Every member of our workforce is required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

All of our workforce is encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If any member of our workforce believes or suspects a breach of this policy has occurred or that it may occur this should be reported in accordance with our Whistleblowing Policy as soon as possible (the contact details to raise an issue, on the confidential Whistleblowing Telephone Hotline can be found here: [Whistleblowing Policy](#)). You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If any member of staff is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, this should be raised with your manager.

We aim 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. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the UK HR Manager immediately. If the matter is not remedied and you are an employee, you should raise it formally using our Grievance Procedure.

Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.