

Applicable to	Staff of Gripple Limited and all subsidiary companies. Third parties working for or on behalf of Gripple Limited and its subsidiaries Suppliers and business partners.
Approved by	Gripple Limited Board of Directors
Effective date	April 2019
Version	2
Review date	January 2020
Linked policies and documents	Whistleblowing Policy
Previous versions	Version 1 - 2018

1. Policy statement

- 1.1 We are committed to making Gripple a great place to work and to running our business responsibly and ethically. As a company, Gripple maintains relationships with a number of different organisations in its supply chain, as well as employing directly a large number of people. In light of the Modern Slavery Act 2015 (“the Act”), we will keep under review our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our business or in our supply chains.
- 1.2 Modern slavery is a criminal offence under the Act 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. We have a zero-tolerance approach to modern slavery and we are 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.
- 1.3 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 Act.
- 1.4 We expect the same high standards from the GLIDE group of companies, all of our contractors, suppliers and other business partners. As part of our contracting processes, our suppliers must state that they have read and understood this

Policy and in turn, provide their own statement and/or policy where applicable. We expect that our suppliers will hold their own suppliers to the same high standards.

- 1.5 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.
- 1.6 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the policy

- 2.1 Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Gripple Limited 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.
- 2.2 The People & Culture team has primary and day-to-day responsibility for implementing this policy, ensuring adequate and regular training on it and the issue of modern slavery, 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.
- 2.3 The supply chain team must also provide assistance with reviewing the risk profile of our supply chain to ensure that any procedures implemented are effective in countering modern slavery.
- 2.4 Managers and team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy.
- 2.5 You are 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 People & Culture team.

3. Compliance with the policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 3.3 You must notify your manager or team leader as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4 You are 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.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or team leader. If you have continued concerns after raising the matter with your manager or team leader you should raise it with the Gripple Limited Managing Director in accordance with our Whistleblowing Policy as soon as possible. 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.
- 3.6 If you are 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, raise it with your manager or team leader.
- 3.7 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 People & Culture team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure which is available from our People & Culture team.

4. Communication and awareness of this policy

- 4.1 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.
- 4.2 Our zero-tolerance approach to 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.

5. Breaches of this policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.