

MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

As an Employment Business, Global Highland Ltd (GHL) maintains relationships with many different organisations in its supply chain, as well as supplying varying levels numbers of contract, interim, temporary and permanent workers. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine what existing measures are undertaken and what further measures may be required to prevent Modern Slavery and Human Trafficking taking place in any part of our businesses or supply chain.

CORE VALUES

GHL has adopted a statement of our Values on the prevention of Modern Slavery and Human Trafficking. This value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

- We expect all or who have, or seek to have, a business relationship with GHL and/or any member of our company, to familiarise themselves with, and act at all times in a way which is consistent with, our anti-slavery stance.
- We are committed to opposing Modern Slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.
- We are committed to the REC Code of Professional Practice General Principles that we act with respect and integrity at all times.
- 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 those of our suppliers.
- We are 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 we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

RESPONSIBILITIES

Ultimate responsibility for the prevention of Modern Slavery rests with GHL's leadership. The Managing Director has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.

Line 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.

All Employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of Modern Slavery and to conduct business in a manner such that the opportunity for and incidence of Modern Slavery is prevented. Adherence to this policy forms part of all Employees obligations under their contract of employment.

REPORTING

GHL's Whistleblowing Procedure and Policy Statement are intended to provide guidance on how concerns can be communicated to GHL. Concerns about suspected Modern Slavery associated with the Company or our suppliers may be reported by Employees in this manner. In summary, a team member should approach a Line Manager with the nature of the complaint who will determine GHL's next course of action.

The GHL QHSE Suggestion Box may be accessed by Employees or any other person wishing to raise a concern. This reporting method can be used in any of the following circumstances:-

- You suspect a person acting on behalf of GHL is seeking to exploit another in a way which could amount to Modern Slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to Modern Slavery;
- You have received an approach from a person acting on behalf of GHL who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;



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- You have information which leads to the rational conclusion that a person acting on behalf of GHL or suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Reports to the QHSE Suggestion Box are kept in confidence, subject to the need for GHL to act responsibly and within the law.

The source of reports via this method will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of Modern Slavery being committed on our behalf or in any element of our supply chain.

GHL encourages members of the public or people not employed by us to email in confidence, to the Managing Director at info@globalhighland.com to raise any concern, issue or suspicion of Modern Slavery in any part of our business or related supply chain.

SAFEGUARDS

GHL 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. GHL will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

COMMUNICATION AND AWARENESS OF THIS POLICY

Our zero-tolerance approach to Modern Slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

REVIEW

Following its initial adoption, this Modern Slavery and Human Trafficking Statement will be reviewed by GHL's Managing Director on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our procedure on Modern Slavery and Human Trafficking which is published at the same time as this Statement and will be reviewed in line with the same.

Date of Adoption: 1st March 2017

Reviewed: 31st May 2018

Next Review: 11th January 2019

Jia MacKenzie
Managing Director