



HUMAN NATURE:  
AT ITS BEST

People  
Policy

GC23POL06

# MODERN SLAVERY AND HUMAN TRAFFICKING POLICY



# CONTENTS

- Purpose..... 3
- Escalation and remediation process..... 4
- Our modern slavery policy..... 5
- Reporting issues..... 6
- The action we will take..... 7
- Your protection..... 8
- FAQs..... 9–10



# PURPOSE

At Ground Control we know that slavery, servitude, forced, bonded and compulsory labour and human trafficking affects both adults and children across the globe. These can all result in the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It is growing issue with globalisation and increased migration. It remains a hidden abuse and no industry sector, no matter how small or specialist is immune to modern slavery.

## The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
- (b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

Ground Control has a zero-tolerance approach stance to modern slavery and human trafficking within our own business and that of our third parties, including and not limited to our suppliers and field teams. We expect the same high standards from all of our contractors, suppliers and field teams and as part of our contracting processes we ensure all of our partners are aware of our zero-tolerance stance and expect and require all of them to hold themselves and their own suppliers to the same standards as is consistent with our disclosure obligations under the Modern Slavery Act 2015.

Our policies confirm our 'zero tolerance' approach and we are committed to acting ethically and with integrity and to maintaining systems and controls which are designed to prevent modern slavery and human trafficking from taking place in our business or across our supply-chain. Our Whistleblowing Policy provides a mechanism for our employees and others working in our supply-chain to report suspected breaches of these policies We are committed to ensuring a working environment where people's fundamental rights and freedom are respected and embraced.

## VALUES

At Ground Control our values are a key component of how we operate as a business. They are at the core of who we are as a business and lay the foundation for our culture.

Our people policies were developed in alignment with our values, and we expect all people and managers to apply our values in their interactions and in implementing this policy.

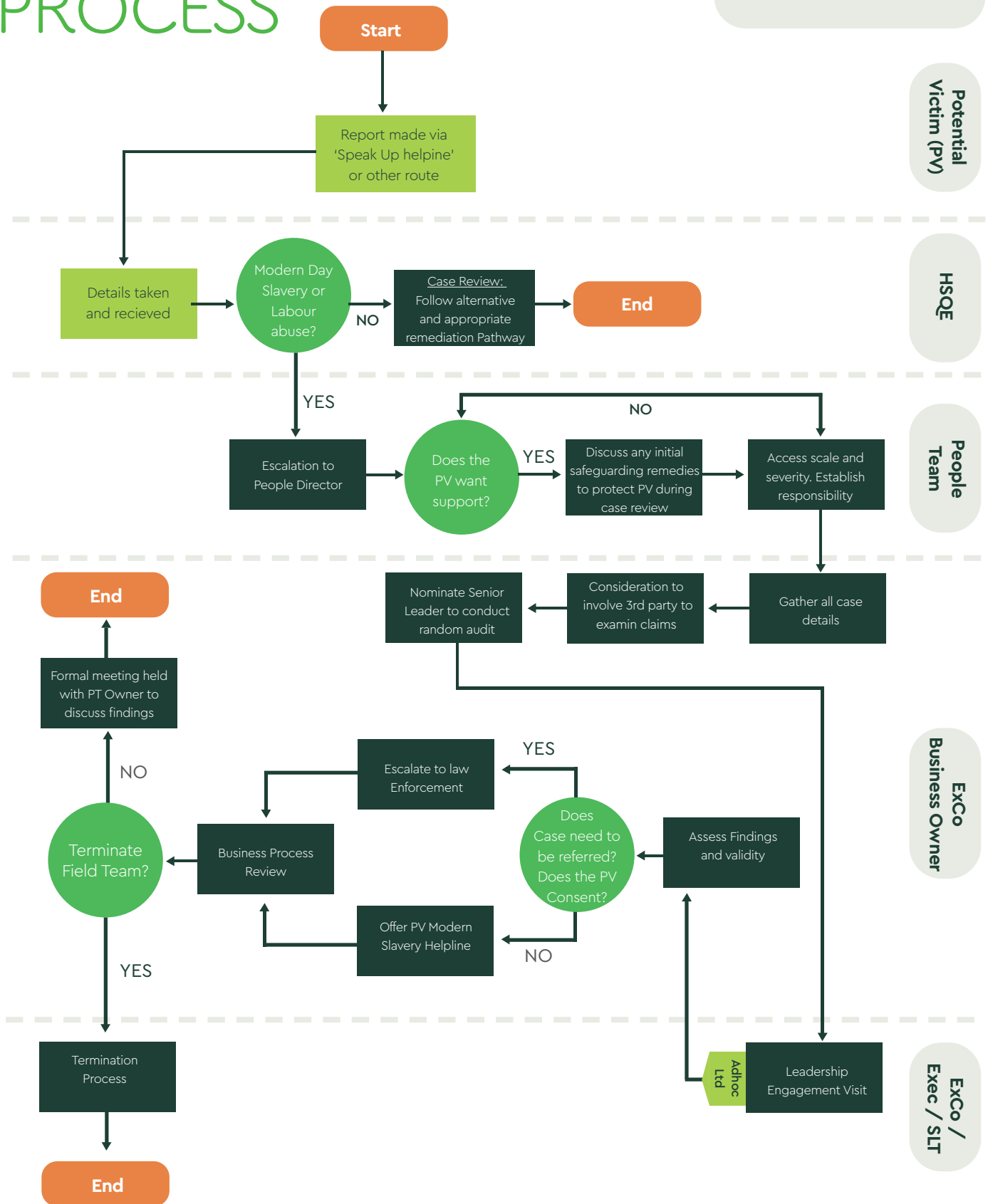


## WHO IS THIS POLICY FOR?

- All permanent and temporary employees, agency staff, consultants, contractors and field teams working within and with the Ground Control group.
- All people working with or alongside Ground Control are responsible for ensuring this policy is implemented correctly.
- Our Executive Committee and our Modern Slavery Working Group take responsibility for reviewing this policy on a regular basis and ensuring that it is implemented across the Group.

# ESCALATION AND REMEDIATION PROCESS

**Speak Up  
Helpline Number**  
0800 915 1571





# OUR MODERN SLAVERY POLICY

Slavery is a term which covers a range of activities involved when an individual is held in compelled service. This usually includes the exploitation of that individual for personal or commercial gain.

## SLAVERY CAN TAKE A RANGE OF GUISES INCLUDING:

- **Human trafficking:** the use of violence, threats or coercion to transport, recruit or hold people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.
- **Forced labour:** any work or services people are forced to do against their will, usually under threat of punishment.
- **Debt bondage/bonded labour:** when individuals borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.
- **Child slavery:** a child being exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.
- **Forced and early marriage:** being married against someone's will. Most child marriages can be considered slavery
- **Domestic servitude:** enforced into work in an individual's home.

Slavery is an increasing problem in the UK and Republic of Ireland, largely due to increased migration and complex supply chains which make it harder for organisations to spot exploitation and abuse in their supply chains.





# REPORTING ISSUES

## Our primary aim is to prevent modern slavery occurring in the first place.

This includes within our own business, but also across our field teams and supply chains.

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.

We recognise that modern slavery is ever evolving and complex and we commit to working with our contractors, suppliers and field teams to address the issue of modern day slavery. If we do identify any instances or suspected instances of modern slavery, we will make every effort to address the situation working in partnership with our suppliers. This will include a full investigation and appropriate action.

We want all of our employees and partners to be fully aware of the risks relating to modern slavery and how they can occur in our supply chain, and we actively encourage anyone and everyone to report any concerns they have relating to modern slavery.

## Raising a concern

If you have a concern about modern slavery, you must report it.

You can raise your concerns with a member of the Executive team, a member of the People Team or via our independent 'speak up' helpline. This confidential helpline is run by Safecall our third-party providers, to ensure that any concerns about modern slavery are raised and addressed appropriately.

You may choose to remain anonymous, but you will be encouraged to provide your name and contact details, to help make the subsequent investigation as effective as possible, and so we can keep you up to date with progress.

You can contact them on: **0800 915 1571** or **1 800 812 470** if you are in Ireland. Or use the form on the following link: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

## MODERN SLAVERY AND EXPLOITATION HELPLINE

If you are in the UK, you can raise concerns via the UK modern slavery and exploitation helpline on: **0800 0121 700.**

This helpline is a wholly independent, non-governmental line, which is free to call and can be called for advice and possible options before you make the decision to report formally.





# THE ACTION WE WILL TAKE

## What happens next

If you raise a concern relating to modern slavery via Ground Control or our 'speak up' helpline, we will likely ask to meet with you promptly so we can discuss the concerns raised in more detail. This may result in us commencing an initial investigation process which we will seek to complete as quickly as possible. Any initial investigation will be led by a member of our Executive team and the safety of any possible victims of modern slavery will be paramount.

We will also take all reasonable steps to ensure you are not subjected to any harassment, victimisation, disciplinary action or any other detrimental treatment as a result of you raising concerns or reporting in good faith a suspicion that modern slavery of whatever form may be taking place. We may also deem it necessary to engage external expertise such as law enforcement.

Please note that if you decide to remain anonymous, all communications will be through Safecall, our external helpline provider, who will identify you using an individual reference number.

In all circumstances we will prioritise mobilising support for any potential victims of modern slavery and ensuring that they are made safe.

All potential victims will also be provided with the number for the UK modern slavery and exploitation helpline.

## Where modern slavery is identified

Where we do identify modern slavery, we will immediately stand down or suspend any employees, teams or suppliers involved pending the outcome of a full investigation. We expect all employees, field teams, operatives and suppliers to engage in full with any investigation and failure to do so will result in immediate termination.

Once an investigation is complete, we will meet with the field team or suppliers and inform them of the outcome of the investigation and any resulting action we are taking. This could include an action to terminate or cease working with a team or supplier.

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





# YOUR PROTECTION

## Confidentiality

So far as possible, the company seek to protect the identify of any individuals reporting concerns about modern slavery. We will only disclose your identify, if known, if it is necessary to do so for the purposes of our investigations, to obtain legal advice, or to comply with a legal or regulatory obligation.

While we will take every effort to ensure your identity isn't disclosed, it may become necessary to identify you or become possible for third parties to deduce your identity. For this reason, we can't guarantee anonymity.

We will also take all reasonable steps to ensure you are not subjected to any harassment, victimisation or disciplinary action as a result of raising your concerns. As far as possible, any supporting evidence relating to your disclosure will be kept secure at all times.

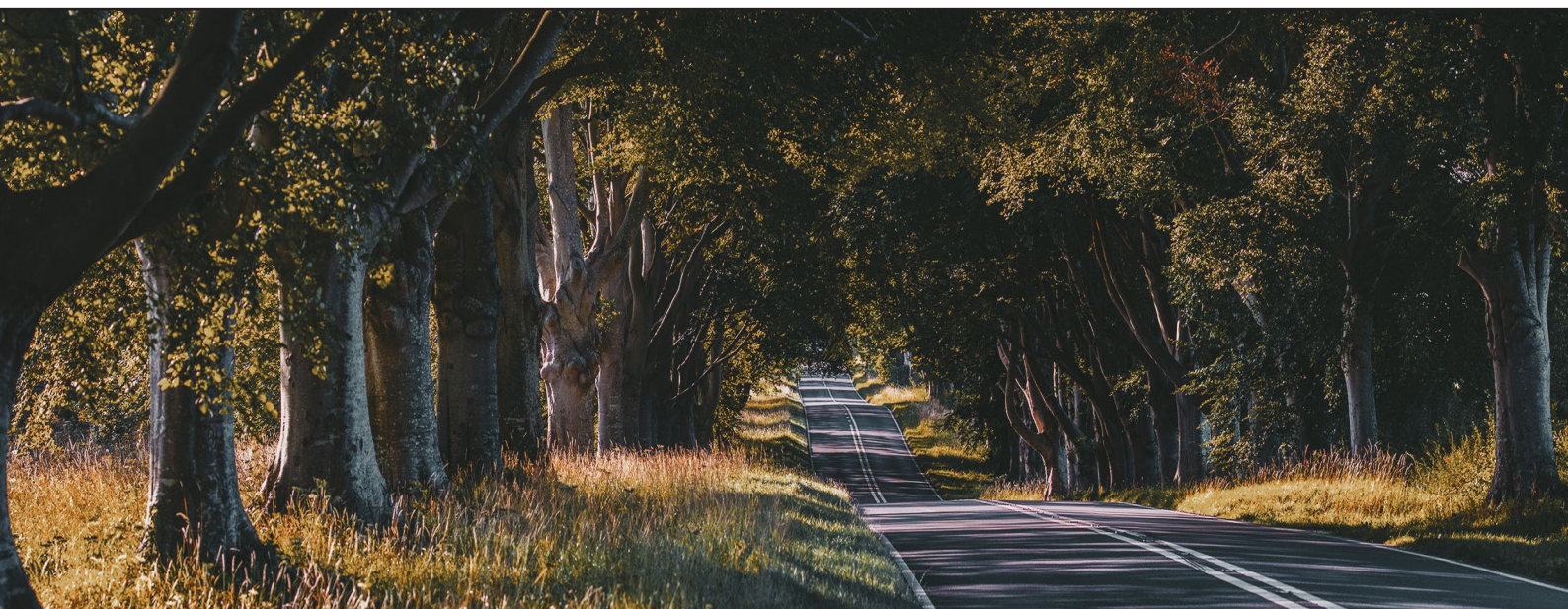
We do encourage anonymous reporting over remaining silent, but we acknowledge that an anonymous report is likely to be more difficult for us to investigate and we will not be able to provide you with detailed feedback.



## Our commitment

This policy is communicated out to all employees, contractors, consultants, field teams and suppliers on an annual basis along with training to help these individuals identify the risks and signs of modern slavery.

We have committed to tackling modern slavery and recognise the detrimental impact it has on individuals and societies. We therefore have appointed a Modern Slavery Working Group which meets regularly to discuss how we can better improve our approach to addressing modern slavery and how we can improve our processes and procedures in all areas.





# FAQS

## What is modern slavery?

Slavery is a term which covers a range of activities involved when an individual is held in compelled service. This usually includes the exploitation of that individual for personal or commercial gain. It can take a range of guises including forced or indentured labour, child labour and domestic servitude. If after reading this policy, you are unsure if your concern falls into the category of modern slavery, you can contact the UK modern slavery and exploitation helpline on 0800 0121 700. This helpline is a wholly independent, non-governmental line, which is free to call and can be called for advice and possible options before you make the decision to report formally.

## How do I raise a concern?

You can raise your concerns with a member of the Executive team, a member of the People Team or via our independent 'speak up' helpline run by Safecall. You can contact them on: **0800 915 1571** or **1 800 812 470** if you are in Ireland, or use the form on the following link: [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

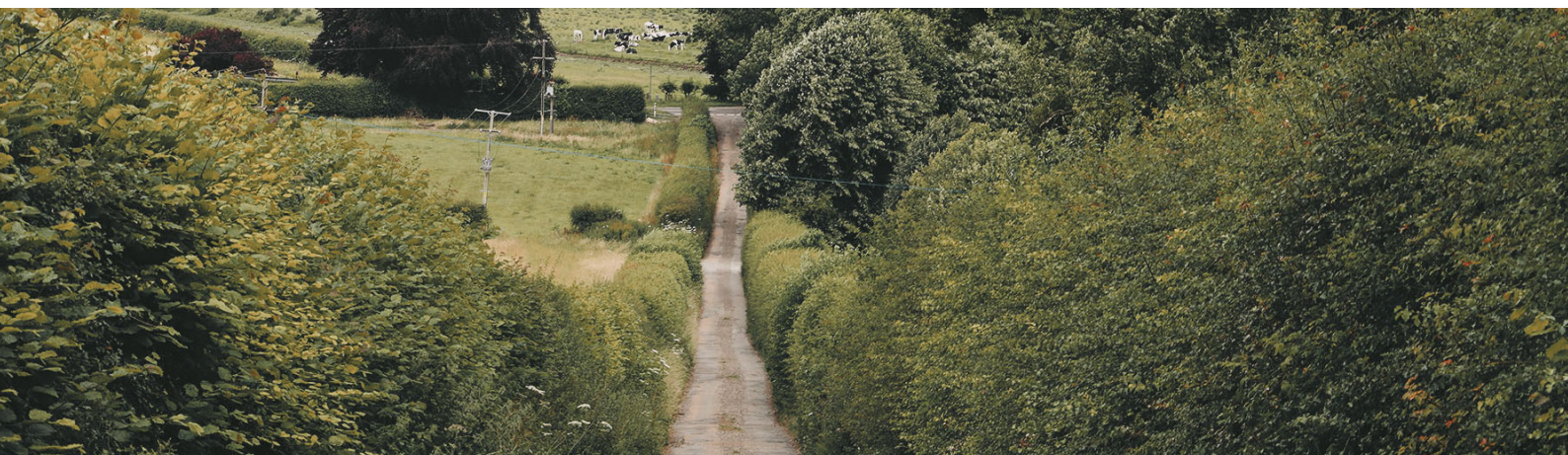
You can also contact the UK modern slavery and exploitation helpline on 0800 0121 700.

## Can I get help or advice?

We would recommend that you speak to your line manager, a member of the People team or our independent 'speak up' helpline run by Safecall. You can contact them on: **0800 915 1571** or **1 800 812 470** if you are in Ireland, or use the form on the following link: [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

## Is the process confidential?

If you have raised the concern in good faith we will do our utmost to ensure we protect your confidentiality and identity. We may need to do so if it is necessary to do so for the purposes of our investigations, to obtain legal advice, or to comply with a legal or regulatory obligation but we will discuss this with you.





# FAQS

## Things to note

- This policy is separate from your contract with Ground Control.
- It replaces all previous Modern Slavery policies.
- We'll review this policy regularly to make sure it is up to date and complies with relevant legislation.
- We may change this policy at any time.

## Other relevant policies

Individuals reading this policy should also review and ensure they are familiar with the following policies:

- Whistleblowing Policy
- Human Rights Policy
- Honest and Ethical Behaviour Policy
- Equality, Diversity and Dignity at Work Policy
- Supplier and Field Team Code of Conduct
- Recruitment policy

Arrangements for the control and management of GC23POL06 are contained within the Ground Control Integrated Management System (IMS). The effectiveness of these arrangements and our performance are routinely monitored and is subject to an annual review as a minimum. This Policy will be brought to the attention of all employees, Field Teams, supply chain partners and persons working on behalf of Ground Control.

This policy will next be reviewed in April 2026.

## Authorisation



Jason Knights  
Managing Director



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