

## Anti-Modern Day Slavery Policy

### Introduction

This statement sets out GEZE UK actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018 & 1 April 2018 to 31 March 2019.

As part of the automatic door industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

### Organisational structure and supply chains

This statement covers the activities of GEZE UK and all of its subsidiaries throughout the United Kingdom.

GEZE UK aims to maintain and improve our position as a premium supplier of all automatic door systems (swing & slide), door closers, manual sliding door systems, glass rails and fittings, window operators and smoke control systems including service and repair of such to all industry sectors services to all sectors serviced. We do this by seeking new challenges, learning and adapting, and using the latest cutting edge technology to provide those services to a level of quality and flexibility that satisfies or exceeds customer, legal and other requirements. In order to do this GEZE UK is committed to increase the effectiveness of our Integrated Management System, to continually improve competence levels, and to monitor performance and deliver supply chains that are free from slavery and human trafficking.

### Operation and supply

The organisation provides services from multiple locations across the UK. Assessment of risk within health, safety, quality, environment “HSQE” and other areas is fundamental to our operations. The company applies a risk based approach to all business risks including that of slavery and human trafficking.

The company applies a risk assessment on the above areas in advance of new contracts and new operations and periodically on established locations.

### High-risk

The board consider the services supplied by GEZE UK to be at a low risk of slavery or human trafficking.

### Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Managing Director is tasked by the board with putting in place and reviewing policies in this area.
- **Risk assessments:** The risk committee assess risk potential and assign controls and monitoring of those controls as appropriate.
- **Investigations/due diligence:** Self assessments and audit of control compliance is conducted by the HSQE Manager.
- **Training:** All employees have received guidelines and training to better understand and respond to slavery and human trafficking risks.

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### Relevant policies

The organisation communicates this Anti-Modern Day Slavery and Human Trafficking Policy to all parties which describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations as detailed below; all supporting policies are reviewed annually and signed by the Managing Director.

### Reporting of non-compliance

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

### Employee code of conduct

The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating throughout the UK and managing its supply chain.

### Supplier/Procurement code of conduct

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics as outlined in our Business Ethics and Corporate Social Responsibility Policy. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

In relation to slavery and human trafficking, the company assesses areas of high risk within the key supplier base and conducts a pre-qualification questionnaire. This is revisited annually.

### Recruitment/Agency Workers policy

The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. In relation to slavery and human trafficking, the company assesses areas of high risk within the key supplier base and conducts a pre-qualification questionnaire.

### Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

### Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is requiring all supply chain managers and HR professionals to have completed training on modern slavery and the system for supply chain verification is updated for slavery and human trafficking risk.

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### Training

The organisation requires all supply chain managers and HR professionals to complete training on modern slavery. The organisation's modern slavery training complies with the Ethical Training Initiative "ETI" and International Labour Organisation.

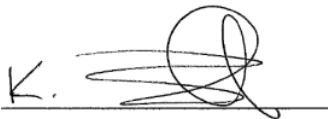
### Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by distributing electronic flyers to staff and putting up posters across the organisation's premises.

### Board approval

This statement has been approved by the board of directors who will review and update it annually.

The implementation of this policy is the responsibility of the Managing Director, assisted by the UK HR Manager and other members of the UK Management Team.



K. Spiewakowski  
Managing Director