



# POLICY

## ANTI-SLAVERY AND HUMAN TRAFFICKING

*Gentrack*





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## 1. Taking a stand against modern slavery

Gentrack is a global software and services business with operations and customers across Europe, North America, Middle East, and Asia-Pacific. We are committed to the value of human rights and ensuring that all business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. It is vital for us to maintain this reputation as it generates confidence in our business.

The Modern Slavery Act 2015 applies to all the Gentrack Group's business operations in Europe, North America, Middle East, and Asia-Pacific (the "Company"). Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

- slavery, servitude (coercing someone to provide services) and forced and compulsory labour;
- human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
- committing any offence with the intention to commit human trafficking;
- aiding, abetting, counselling or procuring any of the above offences.

All of these forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The Company has a commitment to conduct its business and all its relationships based on integrity.

## 2. Who does this policy statement apply to?

This Anti-Slavery and Human Trafficking Policy applies to all directors, officers and employees collectively, of the Company. This Policy should also be read in conjunction with the Company's Code of Ethics which serves as a guide for how our employees conduct themselves in all aspects of the business

## 3. Zero tolerance to slavery and human trafficking

The Company has a zero tolerance approach to all forms of modern slavery and human trafficking within its business is committed to acting ethically and with integrity in all its business dealings and relationships. We are also committed to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in its own business.

The Company's Board has overall responsibility for ensuring this Policy complies with our legal and ethical obligations and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this



Policy and are given appropriate training on it and the issue of modern slavery and human trafficking.

All employees 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 Company's People Experience team.

The Company, through its recruitment programme and people management activities, has processes in place that are designed to prevent and detect modern slavery and human trafficking. The Company's programme in this regard contains the following elements:

- a) A policy which articulates the Company's commitment to preventing violations of the Modern Slavery Act 2015 within its operations and supply chain, being this Policy;
- b) Communication of this Policy and all relevant elements of the programme to all employees throughout the Company and to our business partners and supply chain;
- c) The assessment of modern slavery and human trafficking risks within the Company and its supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks;
- d) The adoption of appropriate due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers coupled with a requirement that they implement procedures which incorporate the principles of the Modern Slavery Act 2015; and
- e) Training of all relevant individuals throughout the Company so that compliance with its policies and procedures is the duty of all relevant employees at all levels and so that individuals can recognise modern slavery practices and take steps to report and avoid the same.

## 4. Our commitment to anti-slavery

The Company is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery and human trafficking throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act. In addition to the above, the Company provides safe and fair working conditions for all its employees and ensures that no child labour is employed, in line with minimum age laws, within the countries that it operates. The Company expects the same standards from all of its contractors, suppliers and other business partners and as part of its contracting processes, 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 standards.

Pursuant to section 54 of the Modern Slavery Act 2015, the Company's Board commits to publishing a public statement annually, setting out the steps it has taken during that particular financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or within its own business. A copy of this policy is also available for viewing on the Company's website.



## 5. Complying with this policy

Anyone working on the Company's 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 suppliers must read, understand and comply with this Policy. The prevention, detection and reporting of modern slavery in any part of the Company's businesses and supply chain is the responsibility of all those working for it or under its control. Those working on the Company's behalf are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

You must notify an Executive Director of the Company or the Company's Legal/Commercial Team as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future. Employees are encouraged to raise concerns about any modern slavery likely in any parts of the Company's supply chain at the earliest possible stage.

## 6. Reporting policy breaches

Internal reporting is critical to the Company's success and it is both expected and valued. Employees are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that they become aware of. Complaints will be kept confidential and will be dealt with appropriately. There will be no retribution or retaliation for complaints regarding a possible Policy breach, in line with the Company's whistle blowing / Protection Disclosure Policy.

If an employee believes that a breach of this Policy has occurred or is likely to occur, they must notify their manager and the Company's Legal/Commercial team as soon as possible. If the employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, it should be raised with their manager and the Company's Legal/Commercial team.

The Company encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any staff member believes that they have suffered any such treatment, they should inform the Company's Legal/Commercial team immediately.

## 7. Awareness of this policy

Training on this Policy and on the risk our business faces from modern slavery will be provided to new starters during induction and to existing employees as otherwise necessary. 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.

## 8. Breaches in this policy

Any employee who breaches this Policy by engaging in or conspires to engage in any modern slavery conduct or human trafficking will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and if warranted legal proceedings may follow. The Company may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this Policy.

## 9. Key contacts for this policy

If you have any questions about this Policy, please contact your local People Experience or Legal/Commercial team.