

Modern Slavery Statement for Financial Year Ending 30 June 2019

Modern slavery encompasses slavery, servitude, forced labour (including child labour) and human trafficking. GEW (EC) Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting equally, ethically and with integrity and transparency in all business dealings, we aim to operate effective systems and controls to safeguard against any form of modern slavery taking place within the business or our supply chain.

We are committed to continually improving our practices to ensure there is no slavery or human trafficking in our supply chains or in any part of our business. This applies to all Directors, employees and business partners. GEW (EC) Limited takes its obligations under the Modern Slavery Act 2015 seriously and has working practices to promote compliance. Any concerns should be directed to our UK HR Management at the earliest opportunity who can be contacted at privacy@gewuv.com.

Supply Chain

GEW (EC) Limited operates from its manufacturing headquarters in the United Kingdom. We also operate in Europe and the USA. Suppliers to GEW are critical to the success of our business. We have a large supplier base consisting of approximately 300+ vendors although we maintain a much smaller preferred supplier list. The majority of our suppliers are UK based. With regard to international supply chains we expect them to adopt suitable anti-slavery and human trafficking policies and processes, in compliance with all international legislation which may apply. We expect each entity in the supply chain to at least adopt a 'one up' due diligence on the next link in the chain. It is not practical for us (and every participant in the chain) to have a direct relationship with all other links in the chain.

We do not tolerate modern slavery or human trafficking in any part of our business, and we expect the same high standards from our suppliers and contractors.

Supplier Selection Process

As part of our initiative to identify and mitigate risk, we undertake due diligence when selecting appropriate vendors. For example (this list is not exhaustive):

- Identify region specific risks: assessing the ongoing country environmental, social or political risk.
- Vendor selection; could include:
 - Site visits - assessing the vendors working conditions, suitability and/or compliance with our ethical practices.
 - Sourcing alternative vendors if standards are not met
- New vendors are required to complete a supply chain survey as part of the supplier approval process to ensure they meet our required standards.

We require confirmation that our suppliers:

- Have taken steps to eradicate modern slavery within their business.
- Hold their own suppliers to account over modern slavery.
- Have ethically sourced all employees or staff that work for them in any capacity.

- Pay their employees at least any prevailing minimum wage applicable within their country of operations.
- Promote a safe working environment applicable to the country of operations.
- Are financially sound and well managed to produce reliable products of good quality that make a positive contribution to the products we offer our customers.
- Where possible implement processes/procedures that have a positive impact on the environment.

This is subject to ongoing review.

Over the past year we have issued a questionnaire to all suppliers that provide goods or services to GEW. All responses received have confirmed compliance with our Anti-Slavery and Human Trafficking Policy.

Suppliers who do not meet our requirements and cannot demonstrate positive action on areas of concern to GEW will be removed from the preferred supplier list. Should any instances of modern slavery come to light, we may terminate the contract at any time.

Training

Staff training will be provided as necessary relevant to the employee's role. Our Anti-Slavery and Human Trafficking Policy outlines the procedures for reporting concerns. During the financial year under review, Modern Slavery Awareness training has been completed by the Human Resources, Quality and Procurement/Supply Chain teams.

Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Company Values
- Anti-Slavery and Human Trafficking Policy
- Equal Opportunities Policy
- Recruitment Policy
- Grievance Procedure
- Anti-Corruption and Bribery Policy
- Health and Safety Policy

Key Performance Indicators

Our current key performance indicator is the number of reports that are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

We are not aware of any slavery or human trafficking taking place in our business or supply chain, and we shall continue to apply appropriate risk based due diligence processes to ensure compliance with the Act.

Our Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes GEW's anti-slavery and human trafficking statement for the financial year ended 30 June 2019.

Signatory

Signed for and on behalf of the board of directors:

A handwritten signature in black ink, appearing to read 'M. Rae', with a long, sweeping underline that extends to the right.

Malcolm Rae
16 December 2019