



SLAVERY AND HUMAN TRAFFICKING POLICY

Statement of Policy

Global Energy Solutions Ltd incorporating Global Project Services Ltd is committed to conducting its business lawfully, responsibly, and ethically, and to preventing modern slavery and human trafficking in all its forms.

Modern slavery and human trafficking are criminal offences and a violation of fundamental human rights. GES / GPS operates a zero-tolerance approach to slavery, servitude, forced or compulsory labour, and human trafficking within its business and supply chains, and is committed to acting with integrity and transparency in all business relationships.

This policy reflects our commitment to complying with the Modern Slavery Act 2015 and implementing effective systems and controls to ensure modern slavery and human trafficking are not taking place in our operations or supply chains.

We are committed to:

- Preventing slavery, servitude, forced or compulsory labour, and human trafficking
- Acting ethically and with integrity in all business relationships
- Complying with all applicable legislation relating to modern slavery and employment standards
- Treating all personnel fairly, honestly, and with dignity and respect
- Ensuring agreed terms and conditions of employment in accordance with local law and practice
- Paying wages that meet or exceed applicable national minimum wage requirements
- Ensuring working hours comply with legal and industry standards
- Prohibiting child labour, forced labour, bonded labour, and forced overtime
- Respecting freedom of association and collective bargaining rights
- Preventing discrimination, abuse, harassment, or coercion in any form
- Reporting suspected cases of modern slavery or human trafficking to the appropriate authorities

Breaches of this policy may result in disciplinary action, termination of contracts, and referral to relevant authorities.

Scope

This policy applies to all associated persons, including personnel, suppliers, agency staff, subcontractors, consultants, and anyone else engaged to work on behalf of GES / GPS.

Responsibilities

Directors and senior leadership are responsible for:

- Demonstrating commitment to this policy
- Ensuring appropriate systems and controls are in place to prevent modern slavery
- Promoting ethical business practices and transparency
- Investigating suspected breaches promptly and appropriately
- Ensuring compliance with reporting obligations under the Modern Slavery Act 2015

All personnel are responsible for:

- Complying with this policy and related procedures
- Remaining alert to the risks of modern slavery and human trafficking
- Reporting concerns or suspicions promptly
- Cooperating with investigations where required

Prohibited Conduct

It is strictly prohibited, directly or indirectly, for GES / GPS or any associated person to:

- Engage in, facilitate, aid, or abet slavery, servitude, forced or compulsory labour, or human trafficking
- Use or condone child labour or exploitative labour practices
- Use physical punishment, threats, coercion, intimidation, or verbal abuse
- Restrict workers' freedom of movement unlawfully or withhold identity documents
- Tolerate or ignore suspected instances of modern slavery within operations or supply chains

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Supply Chain and Business Partners

GES / GPS has zero tolerance to modern slavery and human trafficking and expects all suppliers, subcontractors, and business partners to operate in line with our values.

We will:

- Communicate this policy to relevant suppliers and contractors
- Expect suppliers to comply with applicable employment and modern slavery legislation
- Investigate concerns raised in relation to supply chain practices
- Take appropriate action where non-compliance is identified, including termination of business relationships where necessary

Training and Awareness

We are committed to raising awareness of modern slavery risks by:

- Providing appropriate training to relevant personnel
- Ensuring directors and senior management are briefed on modern slavery risks
- Promoting awareness of reporting routes and whistleblowing protections

Reporting

- Anyone who suspects modern slavery, human trafficking, or breaches of this policy must report the matter promptly to a company director.
- Concerns may also be raised through our Whistleblowing Policy.
- All reports will be taken seriously, investigated promptly, and handled sensitively and confidentially where possible.
- No individual will suffer detriment for raising a concern in good faith.

Monitoring and Review

This policy will be reviewed regularly and updated as required to reflect changes in legislation or organisational needs.

Signed on behalf of Global Energy Solutions Ltd by

Ross Thomson
Managing Director

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