

GEOamey

Slavery and Human Trafficking Statement

Financial Year Ending 31 December 2018

1. Purpose

The purpose of this statement is to clearly outline GEOamey's objectives to prevent modern slavery and human trafficking within our business and our supply chain. This is written in accordance with Section 54 of the Modern Slavery Act 2015.

2. Introduction

Operating since 2011 GEOamey specialises in the provision of Prisoner Escorting and Custody Services (PECS) to the Ministry of Justice since.

3. Policy Statement

3.1 The GEOamey values, business ethics and recruitment policy sets out the behaviour we expect from all employees and supply chain partners.

3.2 Modern Slavery is a crime and a violation of an individual's human rights. It takes various forms such as slavery, servitude, forced or compulsory labour and human trafficking all of which having one thing in common. The deprivation of a person's freedom by another in order to exploit them for personal or commercial gain. GEOamey has a zero tolerance approach to slavery, with the responsibility to act ethically and with integrity in all of our business ventures and to establishing and enforcing effective systems to ensure modern slavery is not taking place anywhere in the business or in any of our supply chains.

3.3 We are dedicated to ensuring there is transparency in the GEOamey business and in our approach to tackling modern slavery throughout our supply chains, consistent under the Modern Slavery Act 2015. We expect the same standards from all of our contractors, suppliers and business partners including specific prohibitions concerning modern slavery. GEOamey's response is to work closely within the supply chain to improve performance standards and review on going relationships.

3.4 GEOamey has assessed compliance within its existing supply chain and will assess any new suppliers for compliance with the following criteria:

- No forced labour or human trafficking is practised and employment is freely chosen
- Working conditions are safe and hygienic
- Working hours are not excessive
- A fair wage is paid
- No child labour is exploited
- No harsh, cruel or degrading practices are allowed
- No discrimination is practised

A failure to comply with the above is an absolute bar to pre-qualification as a supplier.

4. Who does this policy apply to?

4.1 This policy will apply to all employees' part to full time employees, temporary staff and contractors working third party acting on behalf in any capacity.

4.2 This policy will not be included in our employee's terms and conditions and may be amended at any time.

5. Responsibility for the policy

- 5.1 The board of GEOAmeY has the overall responsibility for ensuring this policy is compliant with our legal and ethical obligations
- 5.2 GEOAmeYs human resource department work closely with the procurement team having accountability for implementing this policy, monitoring its use and effectiveness and dealing with queries about it to ensure they are in effect in countering modern slavery.
- 5.3 Management at any level are responsible for ensuring those reporting to into them understand and comply with the Modern Slavery policy.

6. Compliance with this policy

- 6.1 You must ensure that have understood and comply with this policy
- 6.2 The prevention, detection and reporting of modern slavery in any part of the GEOAmeY business or supply chain is the responsibility of each member of staff
- 6.3 As a GEOAmeY employee you are required to avoid any activity that might lead, or suggest a breach of this policy.
- 6.4 You are expected to report as soon as possible
 - Whether you know or suspect any form of modern slavery is occurring in any part of the business
 - Whether you know or suspect a breach of this policy which has happened or hasn't occurred to your line manager, a member of the compliance team or if you are uncomfortable to raise this issue with your line manager please report it to the whistleblowing helpline.
- 6.5 If at any time you're unsure regarding a particular act i.e. the treatment of workers more generally or their working conditions and you feel it may constitute to the multiple forms of modern slavery. Please raise this through your line manager or a member of the compliance department.
- 6.6 As a business GEOAmeY encourages openness and will support any colleague who raises genuine concerns under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery is or may be taking place in any part of the business or in any of GEOAmeY's supply chain.

7. Communication and Awareness of this Policy

As part of GEOAmeY's commitment to eradicating modern slavery, we need to ensure all employees fully understand what is meant by modern slavery, understand how to recognise it and how to act in the event that they consider somebody is a potential victim of modern slavery.

8. Recruitment and Training

GEOAmeY employs around 2,400 employees within the UK. We undertake pre-employment screening that includes identity checks and confirmation of entitlement to work in the UK, on all employees prior to commencing employment with us. On joining each employee shall receive an induction which covers the essential policies and information in relation to policies and procedures and matters such as whistle blowing.

9. Breaches of this Policy

Noncompliance with this policy by any employees may result in a disciplinary action up to and including summary dismissal.

10. Further Information

If you have any further queries regarding this policy please contact a member of the human resource department on Number 01162983710 or e-mail

11. Further Steps

Our measures to combat Modern Slavery are in constant review and the pro-active regime of internal and external audits shall continue and will help maintain compliance.

This statement is made pursuant to section 54 (i) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018.



David Jones
Managing Director